IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EVELYN CINTRON, :

: 19-CV-4078

Plaintiff

:

-VS-

CITY OF PHILADELPHIA, :

:

Defendant

* * * * *

TUESDAY, FEBRUARY 14, 2023

* * * * *

Videotape deposition of EVELYN CINTRON, was taken at the law offices of Mincey, Fitzpatrick,
Ross, 1650 Liberty Place, Philadelphia, Pennsylvania,
before Renee Schumann, a Notary Public of the State
of New Jersey and Notary Public of the Commonwealth
of Pennsylvania, on the above date, commencing at
10:13 a.m.

APPEARANCES:

LAW OFFICES OF MINCEY, FITZPATRICK, ROSS

BY: ISAAC GREEN, ESQUIRE

1650 Liberty Place, Suite 3600 Philadelphia, Pennsylvania 19103

(215) 550-1999

Ike@minceyfitzpatrickross.com
Representing the Plaintiff

CITY OF PHILADELPHIA - LAW DEPARTMENT

BY: SHARON E. ULAK, ESQUIRE

1515 Arch Street, 15th Floor

Philadelphia, Pennsylvania 19102

(215) 683-5083

Sharon.ulak@phila.gov

Representing the Defendant City of

Philadelphia

LAW OFFICES OF O'HAGEN MEYER

BY: KEVIN GOLDEN, ESQUIRE

2 Logan Square, Suite 700

Philadelphia, Pennsylvania 19103

(215) 569-2100

Kgolden@ohagenmeyer.com

Representing the Defendant The Police

Athletic League

ALSO PRESENT: Shala Hollis, Video Specialist

1 2 3 Wi				
	INDEX	Page 3	1	Page 5 THE VIDEOTAPE OPERATOR: All right,
3 WI			2	thank you. Will the court reporter please
	ITNESS	PAGE	3	swear in the witness.
4 EV	VELYN CINTRON,		4	* * * *
5	(Witness Sworn.)		5	EVELYN CINTRON, having been duly sworn
6			6	according to law, was examined and testified
7	DIRECT EXAMINATION BY MS. ULAK	5	7	as follows:
8	CROSS-EXAMINATION BY MR. GREEN	148	8	* * * *
9	CROSS-EXAMINATION BY MR. GOLDEN	155	9	THE VIDEOTAPE OPERATOR: Counsel, you
10			10	may proceed.
11			11	* * * *
12			12	DIRECT EXAMINATION
13	EXHIBITS		13	* * * *
14 NU	JMBER DESCRIPTION	PAGE	14	BY MS. ULAK:
15 Ci	ty-1 E-mail	176	15	Q. Good morning, Ms. Cintron. My name is
16 Ci	ty-2 Statement	176	16	Sharon Ulak, I represent the City of Philadelphia and
17 Ci		176	ΙI	Joseph Sullivan in a lawsuit you have brought. We're
18 Ci	ty-4 Memorandum	176	18	actually here today to continue your deposition, this
19			ΙI	is part two of your deposition, we started part one
20	(Exhibits attached to the trans	cript.)	20	on October 28th of 2022.
21			21	When you began that deposition, Kevin
22 RE	EQUESTS FOR PRODUCTION:		22	Golden had given you some instructions, I am going to
23 BY	MS. ULAK: Page 75 Line 20		23	give you the same instructions so they may sound a
24			24	little bit repetitive, but it's important that we go
		Page 4		Page 6
1 2	THE VIDEOTAPE OPERATOR: T	his begins	ΙI	over them again, and there are some new instructions here because we are on Zoom.
3	media labeled number one of the r		3	So the court reporter here is taking
4	recorded deposition of Ms. Evelyn		ΙI	down everything that you're saying and she's making a
5	the matter of Evelyn Cintron, pla		ΙI	
1 1	City of Philadelphia, defendants,		I 51	transcript out of it. For this reason it is
6	<u> </u>	In The	ΙI	transcript out of it. For this reason it is important that only one of us speaks at a time. In
	United States District Court for		6	important that only one of us speaks at a time. In
6 7 8	United States District Court for District of Pennsylvania. Case 1	the Eastern	6 7	
7		the Eastern 9-CV-4078.	6 7 8	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each
7 8	District of Pennsylvania. Case 1	the Eastern 9-CV-4078.	6 7 8 9	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my
7 8 9	District of Pennsylvania. Case 1 Today's date is February the 14,	the Eastern 9-CV-4078. 2023. The	6 7 8 9	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I
7 8 9	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m.	the Eastern 9-CV-4078. 2023. The	6 7 8 9 10	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a
7 8 9 10	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I	the Eastern 9-CV-4078. 2023. The 'm the legal orting	6 7 8 9 10 11	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make
7 8 9 10 11	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee	6 7 8 9 10 11 12	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it
7 8 9 10 11 12 13	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee	6 7 8 9 10 11 12 13	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're
7 8 9 10 11 12 13	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas	6 7 8 9 10 11 12 13 14	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let
7 8 9 10 11 12 13 14	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services.	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas	6 7 8 9 10 11 12 13 14 15 16	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response
7 8 9 10 11 12 13 14 15	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services. Will all counsel present p	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas lease rd.	6 7 8 9 10 11 12 13 14 15 16	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response and I will do my best to let you finish your answer
7 8 9 10 11 12 13 14 15 16	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services. Will all counsel present p introduce yourselves for the reco	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas lease rd. haron Ulak on	6 7 8 9 10 11 12 13 14 15 16 17	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response and I will do my best to let you finish your answer before I ask my next question.
7 8 9 10 11 12 13 14 15 16 17	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services. Will all counsel present p introduce yourselves for the reco MS. ULAK: Good morning, S	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas lease rd. haron Ulak on	6 7 8 9 10 11 12 13 14 15 16 17 18	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response and I will do my best to let you finish your answer before I ask my next question. If you don't understand a question that
7 8 9 10 11 12 13 14 15 16 17 18	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services. Will all counsel present p introduce yourselves for the reco MS. ULAK: Good morning, S behalf of the City of Philadelphi	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas lease rd. haron Ulak on a and Joseph	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response and I will do my best to let you finish your answer before I ask my next question. If you don't understand a question that I ask you, please tell me that you don't understand
7 8 9 10 11 12 13 14 15 16 17 18 19	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services. Will all counsel present p introduce yourselves for the reco MS. ULAK: Good morning, S behalf of the City of Philadelphi Sullivan.	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas lease rd. haron Ulak on a and Joseph	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response and I will do my best to let you finish your answer before I ask my next question. If you don't understand a question that I ask you, please tell me that you don't understand the question and I will do my best to clarify or
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	District of Pennsylvania. Case 1 Today's date is February the 14, time is approximately 10:13 a.m. My name is Shala Hollis, I video specialist from Lexitas Rep Services. The court reporter is Schumann also in association with Reporting Services. Will all counsel present p introduce yourselves for the reco MS. ULAK: Good morning, S behalf of the City of Philadelphi Sullivan. MR. GREEN: Isaac Green on	the Eastern 9-CV-4078. 2023. The 'm the legal orting Ms. Renee Lexitas lease rd. haron Ulak on a and Joseph behalf of	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	important that only one of us speaks at a time. In everyday conversation people tend to interrupt each other. You might know where I'm going with my question and you might be able to answer it before I complete my question, and if we were just having a chat that would be fine, but because we have to make a transcript and we have to go back and read it later, it's not going to read well if we're interrupting each other. So I just ask that you let me finish my question before you give me a response and I will do my best to let you finish your answer before I ask my next question. If you don't understand a question that I ask you, please tell me that you don't understand the question and I will do my best to clarify or rephrase it. If you don't know an answer to

_			
1	Page 7 I don't want you guessing at anything.	1	Page 9 A. Okay.
2	If you answer a question of mine I'm going to assume	2	Q. Okay. And I'm sorry, just bear with me
3	that you understood the question and that the answer	3	one second here. All right.
4	that you are giving is as truthful and accurate as it	4	And I know this is a continuation of
5	can be.	5	your deposition that we took it a very long time ago
6	If at any time you need to take a	6	and I think especially at the beginning you might
7	break, you should tell me you need to take a break	7	hear some repetitive questions from the first time
8	and we can take a break, I just ask that if I've	8	around and, you know, for that I'm not trying to
9	asked you a question that, you know, the answer	9	trick you, I'm not trying to trip you up. I'm trying
	before we proceed with taking a break and if you	1 1	to reestablish where we were when we had left off.
	yeah, if you have any need to stop at any point, just	11	So, Ms. Cintron, you have brought this
	let me know.	12	lawsuit against the City of Philadelphia and Joseph
13	And as a reminder, even though we're on	1 1	Sullivan and it largely concerns your time as the
	Zoom today and it's a little bit different than the	1 1	commanding officer of the Police Athletic League in
	last time we met, you are still under oath and I do	1 1	the Philadelphia Police Department.
	want to ask if you know, before we proceed do you	16	Am I am I understanding that
	have any anybody in the room with you today?	1 1	correctly?
18		18	A. Yes.
19	Q. Okay. And are you referring to any	19	Q. Okay. And when did you when did you
	documents or notes today?	1 1	become the commanding officer of the Police Athletic
21			League?
		22	-
22	Q. Okay. You testified previously, we had	1 1	A. I believe it was the beginning of 2018.
	discussed this you previously testified on October	23	Q. Okay. A. It was 2018.
24	28th of 2022, do you remember testifying that day?	24	
1	Page 8	1	Q. Okay.
2	Q. And after you gave that testimony, did	2	A. Or '17, I can't recall the exact date.
3	you have the chance to look at your transcript at	3	Q. Okay, and that's fine. If I didn't
4	all?	4	make that clear you can approximate.
5	A. No.	5	For approximately how long were you the
6	Q. Okay.	6	commanding officer of PAL?
7	A. I never received it.	7	A. Two years.
8	Q. Okay. So just so we're clear, you've	8	Q. And how many deputy commissioners did
9	never read that transcript before, right?	9	you report to while you were the commanding officer
10	A. No.	10	of PAL?
11	Q. Okay. And you were under oath that day	11	A. I originally reported to Deputy
12	and you remain under oath today.	12	Commissioner Paterson and then I started reporting to
13	Do you understand all the instructions	13	Deputy Commissioner Sullivan.
14	I've given you?	14	Q. Do you recall for approximately how
15	A. Yes. Yes.	15	long you reported to Deputy Commissioner Paterson?
16	Q. Okay. Sorry, I was getting some	16	A. For about two years.
17	feedback I wasn't sure if your counsel was trying to	17	Q. And then you reported to Deputy
18	chime in with something, I apologize.	18	Commissioner Sullivan for about a year?
19	That is sometimes the challenge with	19	A. Yes.
20	technical difficulties in doing this on Zoom. So if	20	Q. Okay. And when you started at PAL,
21	at any point there's some sort of a technical error	21	what were your duties and responsibilities as the
22	especially if you don't hear a question of mine and	22	commanding officer?
23	it might cut out, you might get interrupted, just	23	A. As the commanding officer my
1	tell me and I will re-ask the question. Okay?	24	instructions were to work that Ted Qualli and I
24	terr me and r will re ask the question. Okay:	2 - 1	instructions were to work that rea guarri and r

_		_	
1	Page 11 would work together to run the Police Athletic League	1	Page 13 Q. Okay. In terms of funding for
2	in terms of all operational and day-to-day	2	programming though, did you have any responsibility
3	programming. Everything that had to do with PAL, Ted	3	for allocating that budget?
4	Qualli and I were supposed to do together as	4	A. The programs team, we had a programs
5	equals as equals, yeah.	5	team and they would allocate certain amount for the
6	Q. Okay. And just for clarity of the	6	different programs to be used for those programs.
7	record, who is Ted Qualli?	7	Q. And who did the programs team work for?
8	A. Ted Qualli was the director of the	8	A. They reported to Ted, but I was in
9	Police Athletic League.	9	charge of the programs team.
10	Q. Okay. And when you say the day-to-day	10	Q. Were they well, again I ask, who did
11	operations, what do you mean by that?	11	they work for?
12	A. Well, we were supposed to work in all	12	A. They worked for the Police Athletic
13	matters pertaining to, you know, developing programs,	13	League, but there were some officers on the on the
14	finances, putting together events. Basically	14	meetings too, at the meetings also.
15	everything to run the organization.	15	Q. Okay. And what did the officers do at
16	Q. When you say finances, did you retain	16	those meetings?
17	any responsibilities for budgeting?	17	A. Well, when I arrived there, we develop,
18	A. When I originally got there we would	18	you know, like meetings so they can coordinate the
19	work on the budget together but things changed	19	events with the officers who were supposed to carry
20	because Ted Qualli and the Board would change the	20	out those programs.
21	budget to what they wanted regardless of what we	21	Q. Okay. But the people on that programs
22	discussed in at PAL.	22	team worked for PAL?
23	Q. Okay.	23	A. Yes, they worked for PAL but I was in
24	A. Between Ted and I and the staff when we	24	charge of the program, and therefore, I would work
	Page 12		Page 14
	worked on the budget.	1	with them, not Ted, to run certain programs.
2	worked on the budget. Q. Okay. In terms of the budgeting, who	2	with them, not Ted, to run certain programs. Q. When you say to run certain programs,
2	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from?	1 2 3	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support?
2 3 4	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department	1 2 3 4	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that
2 3 4 5	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary.	1 2 3 4 5	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent
2 3 4	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department	1 2 3 4 5	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that
2 3 4 5 6 7	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the	1 2 3 4 5 6	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned.
2 3 4 5 6 7 8	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising.	1 2 3 4 5 6 7 8	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did
2 3 4 5 6 7 8	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia	1 2 3 4 5 6 7 8	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL
2 3 4 5 6 7 8 9	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the	1 2 3 4 5 6 7 8 9 10	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget?
2 3 4 5 6 7 8 9 10	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do?	1 2 3 4 5 6 7 8 9 10 11	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes.
2 3 4 5 6 7 8 9 10 11 12	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the	1 2 3 4 5 6 7 8 9 10 11 12	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you
2 3 4 5 6 7 8 9 10 11 12 13	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in	1 2 3 4 5 6 7 8 9 10 11 12 13	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do?
2 3 4 5 6 7 8 9 10 11 12 13 14	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as	1 2 3 4 5 6 7 8 9 10 11 12 13 14	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was
2 3 4 5 6 7 8 9 10 11 12 13 14 15	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget.
2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the staffing support?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget. Q. Did you work with anybody at PAL when
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the staffing support? A. I don't know.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget. Q. Did you work with anybody at PAL when you were doing that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the staffing support? A. I don't know. Q. Okay, that's fine. As commanding	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget. Q. Did you work with anybody at PAL when you were doing that? A. Yes, I would consult with Sunny Li,
2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the staffing support? A. I don't know. Q. Okay, that's fine. As commanding officer of PAL, did you have responsibility to	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget. Q. Did you work with anybody at PAL when you were doing that? A. Yes, I would consult with Sunny Li, sometimes with Ted about what was going on when we
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the staffing support? A. I don't know. Q. Okay, that's fine. As commanding	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget. Q. Did you work with anybody at PAL when you were doing that? A. Yes, I would consult with Sunny Li, sometimes with Ted about what was going on when we had when we would speak about programs.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	worked on the budget. Q. Okay. In terms of the budgeting, who funds PAL; where does PAL get its money from? A. PAL, the Philadelphia Police Department pays the officers' salary. Q. Yes. A. And the Police Athletic League, the nonprofit is based on fundraising. Q. Okay. You say the City of Philadelphia paid the police officers' salaries, what do the police officers do? A. The police officers are assigned to the centers or to an administrative position to assist in the day-to-day tasks that need to be done, as well as run the programs at the center with the children. Q. Okay. Does the Philadelphia Police Department provide any funding to PAL outside of the staffing support? A. I don't know. Q. Okay, that's fine. As commanding officer of PAL, did you have responsibility to	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	with them, not Ted, to run certain programs. Q. When you say to run certain programs, does that involve staffing support? A. Well, it's a basically to ensure that the money that's allocated to the program is spent properly and that we carry out the programs according to what we planned. Q. As the commander officer of PAL, did you have any audit responsibilities over the PAL budget? A. Yes. Q. Can you explain that more, what did you do? A. I had to make sure that the budget was not overspent and that everybody stayed on track in terms of spending according to what was on the budget. Q. Did you work with anybody at PAL when you were doing that? A. Yes, I would consult with Sunny Li, sometimes with Ted about what was going on when we

1		_	
1 +	Page 15 on with the with the budget because we would, you	1	Page 17 before you became the commanding officer of PAL?
2	know, I would let them know what was going on.	2	A. No.
3	Q. Okay. And I'm sorry, I didn't mean to	3	Q. Excuse me. Okay. So when you were
4	interrupt you, who is Sunny Li?	4	appointed commanding officer of PAL, you said that
5	A. Sunny Li was the chief financial	5	you had worked with Ted Qualli and it was your
6	officer at PAL.	6	understanding that the two of you would work as
7	Q. When you were appointed commanding	7	equals at PAL; is that correct?
8	officer of PAL, did you receive any documentation	8	A. Yes. That's what Ted Qualli told me,
9	that would outline your duties and responsibilities	9	Commissioner Ross told me and Bernie Prazencia and
10	as the commander officer?	10	Ron Rabena.
11	A. No.	11	Q. Okay. And as part of your duties and
12	Q. Did you receive any special training to	12	responsibilities as commanding officer the PAL, how
13	be the commanding officer at PAL?	13	often would you meet with PAL Board members?
14	A. No. I had the experience from being	14	A. Only at the general meetings. I met
15	management for almost 20 years.	15	one time with I mean with Bernie Prazencia at his
16	Q. And can you maybe elaborate a little	16	office with Ted which was the week I started, and
17	bit more on what you mean by the experience from	17	then after they told me that I would be at those
18	being management; what were you doing before you	18	meetings but then after that I wasn't invited to
19	became the commanding officer of PAL?	19	those meetings.
20	A. I was the second in command for 25th	20	Q. Were those monthly meetings, bimonthly
21	District, administrative lieutenant and the five	21	meetings, do you know?
22	squad lieutenant in charge of the five squad team.	22	A. They were monthly meetings and
23	Q. How long were you at the 25th before	23	sometimes they would meet more often depending on the
24	you became the commanding officer of PAL?	24	stuff whatever was going on at PAL.
1	Page 16 A. Two years.	1	Page 18 Q. Was the monthly meeting a general board
2	-	l l	meeting?
	management when you became the commanding officer of	l ⁻ l	3.
		3	A. No. They had general board meetings
4	PAL?	3	A. No. They had general board meetings and I would get invited to those.
	PAL? A. Sunny Li and I sat down and she	4	and I would get invited to those.
5	A. Sunny Li and I sat down and she	l l	
5 6	A. Sunny Li and I sat down and she explained the budget to me and how it works.	4 5 6	and I would get invited to those. Q. Okay. A. But I was never invited to the
5 6 7	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in	4 5 6	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings.
5 6 7 8	A. Sunny Li and I sat down and she explained the budget to me and how it works.	4 5 6 7 8	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings.
5 6 7 8	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL?	4 5 6 7 8	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the
5 6 7 8 9	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL?	4 5 6 7 8 9	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting?
5 6 7 8 9 10	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you	4 5 6 7 8 9	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had
5 6 7 8 9 10	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct.	4 5 6 7 8 9 10	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished.
5 6 7 8 9 10 11 12 13	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct.	4 5 6 7 8 9 10 11	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay.
5 6 7 8 9 10 11 12 13	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing?	4 5 6 7 8 9 10 11 12 13 14	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming.
5 6 7 8 9 10 11 12 13 14	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District?	4 5 6 7 8 9 10 11 12 13 14	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at
5 6 7 8 9 10 11 12 13 14 15	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes.	4 5 6 7 8 9 10 11 12 13 14 15	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings?
5 6 7 8 9 10 11 12 13 14 15 16	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings
5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes. A. Oh, like if like when we were doing	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings and state things that we needed to do based on the
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes. A. Oh, like if like when we were doing the certification for the for the Taliah (ph.) and	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings and state things that we needed to do based on the instructions he received from those meetings. So it
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes. A. Oh, like if like when we were doing the certification for the for the Taliah (ph.) and they asked me to do an audit over everything so that	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings and state things that we needed to do based on the instructions he received from those meetings. So it could be anything. It could have been anything.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes. A. Oh, like if like when we were doing the certification for the for the Taliah (ph.) and they asked me to do an audit over everything so that I know where or how rather what was correct and what	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings and state things that we needed to do based on the instructions he received from those meetings. So it could be anything. It could have been anything. Q. Can you give an example?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes. A. Oh, like if like when we were doing the certification for the for the Taliah (ph.) and they asked me to do an audit over everything so that I know where or how rather what was correct and what was incorrect as far as the operations room and the	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings and state things that we needed to do based on the instructions he received from those meetings. So it could be anything. It could have been anything. Q. Can you give an example? A. Yes. Ted said would come from the
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Sunny Li and I sat down and she explained the budget to me and how it works. Q. Okay. Did you receive any training in auditing when you became the commanding officer of PAL? A. No, but I did auditing at the 25th, you know, District to make sure that everything is is, you know, correct. Q. How would you conduct an audit at the 25th District, what were you doing? A. What do you mean, in the 25th District? Q. Yes. A. Oh, like if like when we were doing the certification for the for the Taliah (ph.) and they asked me to do an audit over everything so that I know where or how rather what was correct and what was incorrect as far as the operations room and the cell room and the policy that I wrote was implemented	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and I would get invited to those. Q. Okay. A. But I was never invited to the decision-making meetings. Q. Did they not make decisions at the monthly board general board meeting? A. No, it was to present what we had accomplished. Q. Okay. A. Or what was coming. Q. What types of decisions were made at the decision-making meetings? A. Ted Qualli would come from the meetings and state things that we needed to do based on the instructions he received from those meetings. So it could be anything. It could have been anything. Q. Can you give an example? A. Yes. Ted said would come from the meetings and say in reference to this budget, you

1 we're doing this or we're doing that and he would 2 explain what the Board wanted at that time. It would 3 be about anything, so to pinpoint it it's like hard 4 to pinpoint because it would be about many things. 5 Q. Did you go to the monthly general board 6 meetings? 6 heetings? 7 A. Yes. 8 Q. Did you ever miss any meetings? 9 A. No. 9 I'm sorry, you cut out a little bit. 9 A. No. 10 Q. If you were to have missed a meeting 11 would anybody have gone in your place? 11 A. Ted Qualli was signaling, I caught him 12 A. No. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 those PAL centers; and, two, to look at facilities to 22 Q. Mouth to lips. 23 the red Qualli was signaling him not to say 24 the backlog. There was a backlog of things that 2 (sic) I think his name was, and shortly thereafter 3 Ted Qualli came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out and 4 Sunny Li came out, Sergeant Fells came out, sergeant putsing the dust him to say anything. 6 looked over Ted Qualli was signaling in not to say 7 anything. 8 Q. I'm sorry, you cut out a little bit. 9 I'm to sorry to interrupt you. Who said not to say 10 anything, you just cut out a little bit. 11 A. Ted Qualli was signaling, I caught him 22 with my peripheral, the sergeant putting his finger 13 to his mouth as shush, don't say anything. 14 dell with my peripheral, the sergeant putting his finger 15 like don't s	vertice design this or we're design that and he would 1 followed by the then maintenance person Frant - Frant 2 2 we'll be about sarvthinn, so to mismosis it it's like hard 4 6 pinpoint because it would be about many things. 5 0 0 0 0 0 0 0 0 0	$\overline{}$	Page 10		Page 21
be about anything, as to pimpoint it it's like hard 4 to pimpoint because it would be about many things. 5	be about anything, so to pinpoint it it's like hard 5	1	Page 19 we're doing this or we're doing that and he would	1	Page 21 followed by the then maintenance person Fran Fran
to pirpoint because it would be about many things. G. Did you go to the monthly general board of sections? A. Yes: B. Q. Did you were miss any meetings? A. No. G. If you were to have missed a meeting 10 anything. G. If you were to have missed a meeting 11 would anybody have gone in your place? A. No. G. O Key. So let's back up again and let's 12 with my perigharal, the aergeant gutting his finger 12 with my perigharal, the aergeant gutting his finger 13 when you were first appointed to become a 14 soing like this telling his to atop talking about it, 15 like don't say anything. Mos. Ted Could! were simplifying about it, 15 like don't say anything. Mos. The Gould was shush, don't say anything and he was soing like this telling his to atop talking about it, 15 like don't say anything. Mos. The Gould was shush, don't say anything and he was soing like this telling his to atop talking about it, 15 like don't say anything. Mos. When I first arrived at FAL, we decided 20 to go visit all the PAL centers so that I can get to 20 A. Yes. A. When I first arrived at FAL, we decided 21 howe PAL centers in the tire of the center working at those PAL centers in the tire of the center working at 12 howe PAL centers was a backing of things that 12 and the was sping on in terms of all, you know, all 22 he backleg. There was a backing of things that 24 lead meet to be done at the centers So we went to decide 3 affirers. J. Decided to be done at the centers and to meet the 3 impecting the centers? A. No visited a few centers the first day. My the time we get to Wissinoming PAL, that center a 12 doing events and the center was closed and that's why 22 thad a foul probably a foul smell. At that 12 may reaction of the centers? A. Wo visited a few centers the first day. My the time we get to Wissinoming PAL, that center. A. Wo wissted a few centers the first day. My the time we get to Wissinoming PAL, that center. A. Wo wissted a few centers the first day. My the time we get to Wissinoming PAL, that center. A	Somewish because it would be shout many things. C. Did you no to the monthly memeral board E meetings? A. Yeu. C. Did you were miss any meetings? A. No. C. Did you were miss any meetings? A. No. C. T'you were to have missed a meeting D. T'you were to have missed a meeting A. No. C. T'you were to have missed a meeting D. T'you were to have missed a meeting A. No. C. Ckey, So let's back up again and let's Laik about when you were first seculated to become a Laik about when you were first seculated to become a Laik about when you were first seculated to become a Laik about when you were first seculated to become a Laik about when you were first seculated as commanding officer, Ty what whild did you do? Can you tell us seals a Laik about whose you started as commanding officer, Ty what while a first arrived at PAL, we decided A. When I first arrived at PAL, we decided A. When I first arrived at PAL, we decided To go vist all the PAL contrar and that T can get to Lo wow the one, get to know the officers working at D. Commanding strings in the month of the contrar and that you way. Laik backlog. There was a backlog of things that D. Twe week the centers. So we went to do A. We visited a few centers to so we went to do A. We visited a few centers and to meet the C. And what happened when you were Lazife was in roal deplorable anditions and even Though it's my practice to learn shout the unit that. Lay the time we got to Nieu Stallowship should be a point of the centers and to meet the C. And what happened when you were Lazife was in roal deplorable anditions and even Though it's my practice to learn shout the unit that. Lay the time we got to Nieu Stallowship should be an involved by the first any practice to learn shout the unit that. Lay the time we got to Nieu Stallowship should be an involved by the first and the centers and to meet the C. And what happened when you were Lazife the meetics and to meet the Lay the time we got to Nieu Stallowship should be an inv	2	explain what the Board wanted at that time. It would	2	(sic) I think his name was, and shortly thereafter
So Did you go to the monthly general board 6 weetings? A. Yes. O. Did you were miss any meetings? A. No. O. If you were to have missed a weeting 10 would analybody have mone in your place? If would analybody have mone in your place? A. No. O. Okay. So let's back up again and let's 12 A. No. Sommanding officer of PAL. Men you started as commanding officer. When you started as commanding officer. Men you far the wast a backled of things that 1 can get to 20 to so visit all this PAL centers of this centers and, twa, to look at facilities to 21 A. Risht so long of the centers. So we went to do: A. Me visited a few centers and to meet the 2 in magneting the centers? A. We visited a few centers the first day. Ty by the time we got to wissinced missing page, that center 2 in the packled on the centers. So we went to do: If can be a weak a decision to close wissinoming page that the wast decisions in trens of all, you know, all 2 no choice but to make a decision to close wissinoming page the centers with a mask on to show me the conditions of the centers. A. We visited a few centers the first day. Ty sy the time we got to wissinoming page that centers with a mask on to show me the conditions of the centers. A. We visited a few centers the first day. Ty sy the time we got to wissinoming page that centers with a mask on to show me the conditions of the centers. A. We visited a few centers the first day. The first was when I first arrived at PAL Thick that within that first or second week of me Repet 20 A. The dualli was signaling. I caught his. A. The dualling was the stitle bit. A. The dualling was the study of the inverting at the with the stitle bit. A. The dualling was the stitle bit. A. The dualling was the sti	sectings? A. Yes. O. Did you ever also any meetings? A. No. O. Did you were to have missed a meetings? A. No. O. If you were to have missed a meetings? I would anybody have gene in your place? A. No. O. Can you have gene in your place? A. No. O. Can you see to have missed a meetings? I would anybody have gene in your place? A. No. O. Can you see to have missed a meetings? A. No. O. Can you see to have missed a meetings? A. No. O. Can you see to have missed a meetings? A. No. O. Can you see to the sail little bit. A. No. O. Can you see to have missed a meetings? A. Tod Qualli was signaling. I caught him to ach a finger a sill any of meeting his finger and meeting of the or of Pail. I with any meriphanal, the sempenant putting his finger and pail of the your meeting his finger and pail of the your work and because of the way that the work any mything. Meen you started as commanding officer. A. When I first arrived at PAL, we decided to be done at the centers. So we went to a for you wise all the Pall centers and two, to look at foralities to 22 o. Mouth to lips. A. We was a backlog of things that A. Mo wissited a few centers. So we went to any of the center and the work was a backlog of things that A. Mo wissited a few centers and to meet the A. Me visited a few centers the first day. A. Me visited a few centers the first day. A. Me visited a few centers the first day. A. Me visited a few centers the first day. A. Me visited a few centers the first day. A. The sign the commending of the center. A. Me visited a few centers the first day. A. The sign the commending of the center. A. This was when I first arrived at PAL. This was when I first arrived at PAL. This that that that that fivat or accord work of man of the center was an old in the class of the center with a mask an to about the meeting approach to the meeting and the center of the think it was a process of the countilities of the center. A. This was when I first arrived at PAL. O. Okav. When did you close the cent	3	be about anything, so to pinpoint it it's like hard	3	Ted Qualli came out, Sergeant Fells came out and
A. Vea. Q. Did you ever miss any meetings? A. No. Q. If you were to have missed a meeting Would anybody have gone in your place? L. A. No. L. Would anybody have gone in your place? L. Would anybody have gone in the was done the say	Secretings	4	to pinpoint because it would be about many things.	4	Sunny Li came outside and when the sergeant was
A. No. 3	A. Yes. 8 Q. Did you ever mise any meetings? 8 A. No. 10 Q. If you were to have miseed a meeting 2 11 would anyhorly have gene in your plane? 12 A. No. 13 Q. Skay. We let's back up again and let's 2 14 calk about when you were first appointed to become a 1 to talk about when you were first appointed to become a 1 to talk about when you were first appointed to become a 1 to commanding officer of Pal. 16 When you started as commanding officer. 17 what what did you do? Can you tell us again a 2 18 little Bit about your first raryived at PAL, we decided 20 to so wield all the PAL centers at the PAL centers; and, two, to look at facilities to 22 thanse PAL centers; and, two, to look at facilities to 23 mee what's going on in terms of all, you know, all 23 A. Fight. Bight. So Ted Qualli began to 24 the backing. There was a backing of things that 4 going on in terms of all, you know, all 23 A. Fight. Bight. So Ted Qualli began to 24 the backing. There was a backing of things that 4 going on in terms of all, you know, all 23 A. Fight. Bight. So Ted Qualli began to 2 minspection of the centers and to meet the 3 officers. 1 meeded to be done at the centers and to meet the 3 officers. 2 A. No visited a few centers the first day. 7 ky the time we get to Visitenioning PAL, that center 4 feeling and I went back a few and I think it was 1 feeling the many first arrived at PAL 2 feeling the few few parts of the center was puddles of water 1 and 1 feel center 5 to the center was puddles of water 1 limited the was 1 first arrived at PAL 2 feeling the center was puddles of water 1 limited the wind that 1 feel center 5 to the commanding officer. 20 O. Okay. When did you close Wissinomins 1 feel commanding officer. 3 Deal with yperpathyle, the acceptant put he do to the any anything, to in this mouth an advant a put anything. 1 feel with yperpathyle the many anything and the was a feel of the with the center was closed and the class of the many anything. 3 Deal was a part of the previous 1 feel with yperpathyle	5	Q. Did you go to the monthly general board	5	attempting to talk to me about the center and I
S Q. Did you ever miss any meetings? A. No. Q. If you were to have missed a meeting 11 would anybody have gone in your place? 12 A. No. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backing. There was a backing of things that 25 an inspecting the centers? 6 A. We visited a few centers the first day. 7 by the time we got to Wissinoming PAL, that center 8 timpecting the centers? 8 A. We visited a few centers the first day. 9 The to sorry to interrupt you. Mo ead not to say anything, you just cut out a little bit. 10 Chay. The first arrived at PAL 11 to bim south as shuph, don't say anything about it, the precipheral, the sergeant putting his finger 12 to his mouth as shuph, don't say anything about it, the with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of indicating with your hand towards your neck sort of a making a cutting off motion? 2 A. Bim was going like that (indicating). 2 C. Moy. 3 A. Bim was going like that (indicating). 4 C. And wha	0. Did you ever mise any meetings? 10 0. If you were to have missed a meeting 11 0. O. If you were to have missed a meeting 11 10 would anybody have gone in your place? 11 11 A. No. 12 with my portphrant, the acregant putting his finger 13 0. Okey. So let's back up again and let's 14 telk about when you were first appointed to become a 14 telk about when you were first appointed to become a 15 to momeading officer of PAL. 15 When you started as commanding officer, 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 19 A. Yes. 20 to go visit all the PAL centers a othat I can get to 21 know the one, get to know the officers working at 22 those PAL centeral and, two, to look at familities to 23 see what's osing on in terms of sil, you know, all 24 the backlog. There was a backlog of things that 25 inspecting the centers. So we went to 40 26 an inspection of the centers and to meet the 27 an inspection of the centers and to meet the 28 inspecting the centeral and to meet the 39 inspecting the centeral 40 C. And what happened when you were 41 inspecting the centeral 42 in the backlog. There was a backlog of things that 43 officers. 44 O. And what happened when you were 45 inspecting the centeral 46 in a command decision, I when I went there, I had 40 C. Okay. When did you close Kissinoming 41 be can be conditions of the center. 42 the contern and that hat hat hat hat hat hat hat hat ha	6	meetings?	6	looked over Ted Qualli was signaling him not to say
9 I'm to sorry to interrupt you. Who said not to say 10 Q. If you were to have missed a meeting 11 would anybody have gone in your place? 12 A. No. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer. 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL. 20 to go visit all the PAL centers so that I can get to 21 those PAL centers; and, two, to look at facilities to 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 inspecting the centers? 26 A. We visited a few centers the first day. 27 By the time we got to Wissinoming PAL, that center 28 itself was in real deplorable conditions and even 29 though it's my practice to learn about the unit that 10 're working in and not make hasty decisions in terms 11 of a command decision, I when I went there. I had 12 no choice but to make a decision to close Wissinoming 13 FAL? 15 DAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 20 C. Okay. Mad why did you close the center? 21 A. He was going like that (indicating). 22 A. He was going like that (indicating). 23 A. Hight. So Ted Qualli began to 24 the backlog. There was a backlog of things that 25 the was inspection of the centers and to meet the 26 c. A. We visited a few centers the first day. 27 by the time we got to Wissinoming PAL, that center 28 titeling and I went back a few and I think it was 29 nothing your hand towards your neck sort of 20 no doubt to make a acklog of things that 29 the was going like that (indicating). 20 C. Okay. When did you close Wissinoming 21 doing events and the center was closed and that's was 29 tit had a foul probably a foul meet with the with the without the part was proved by the center of	10	7	A. Yes.	7	anything.
10 Q. If you were to have missed a meeting 11 would anybody have gone in your place? 12 A. No. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the afficers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 inspection of the centers. So we went to do 2 an inspection of the centers and to meet the 3 inspecting the centers? 2 A. Ne visited a few centers the first day. 3 py the time we got to Missinoming PAL, that center 4 Q. And what happened when you were 5 inspecting in and not make a decision to close Wissinoming 13 PAL? 15 The working in and not make hasty decisions in terms 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 place of the commanding officer. 19 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 point we had to leave because of the wey that I was focation in the gym. There was puddles of water 19 the backlog of the conditions of the center. 10 Q. Okay, When did you close Wissinoming 13 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 point we had to leave because of the wey that I was focation in the gym. There was puddles of water 19 Q. Okay, When did you close the center. 19 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 parents were complaini	10 would anythopy have gone in your place? 11 A. Tot Qualli was signaling. I cought him 12 A. No. 13 Q. Okay. So let's back up again and let's 14 calk about when you were first appointed to become a 15 commanding efficer of PAL. 16 Men you started as commanding officer, 17 what what did you do? Con you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 chose PAL centers and two, to look at facilities to 22 chose PAL centers and two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 cheb backlog. There was a backlog of things that 25 an inspection of the centers. So we went to Age 20 Q. And what happened when you were 5 inspecting the centers? 6 A. Ne visited a few centers the first day. 7 by the time we got to kiasinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though It's ey practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close wissinoming 13 to his south as ethical, this time was public of the center. 14 Q. Okay. When did you close Wissinoming 15 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 18 being the commanding officer. 20 Chay, and why did you close the center? 21 A. This was when I first arrived at PAL 22 Chay, and why did you close the center? 23 A. This first thing when I walked into that 24 cheeling and commanding officer. 25 Chay and why did you close the center? 26 A. The first thing when I walked into that 27 center I inseediately gut sick because there was a 28 being the commanding officer. 29 C. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I inseediately gut sick because there was a 22 secons and over the pre	8	Q. Did you ever miss any meetings?	8	Q. I'm sorry, you cut out a little bit.
11 A. Mo. 12 A. Mo. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 those PAL centers; and, two, to look at facilities to 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backley. There was a backley of things that 25 inspection of the centers. So we went to do 26 an inspection of the centers and to meet the 27 an inspecting the centers? 28 A. We visited a few centers the first day. 29 G. And what happened when you were 30 though it's my practice to learn about the unit that 11 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Missinoming 13 PAL? 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 C. Okay, and why did you close the center? 21 C. Okay, and why did you close the center? 22 D. Okay, and why did you close the center? 23 D. Okay, and why did you close the center? 24 D. Okay, and why did you close the center? 25 D. Okay, and why did you close the center? 26 D. Okay, and why did you close the center? 27 D. Okay, and why did you close the center? 28 D. Okay, and why did you close the center? 29 D. Okay, and why did you close the center? 20 D. Okay, and why did you close the center? 20 D. Okay, and why did you close the center? 21 D. Okay, and why did you close the center? 22 D. Okay, and why did you close the center? 23 D. Okay and why did you close the center? 24 D. Okay, and why did you close the center	11 would anybody have gone in your place? 12 A. No. 13 Q. Okay. So let's back up sgain and let's 14 talk about when you were first ampointed to become a 14 talk about when you were first ampointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 10 to go visit all the PAL centers so that I can get to 21 know the one, get to Know the officers working at 22 those PAL centers; and, two, to look at familities to 23 ace what's going on in terms of all, you know, all 24 the backing. There was a backing of things that 25 inspecting the centers. So we went to do 26 an inspecting of the centers and to meet the 27 an inspecting the centers? 28 A. No visited a few centers the first day. 29 And what happened when you were 30 inspecting the centers? 31 of a command decision, I when I went there, I had 31 of a command decision, I when I went there, I had 32 pack to working in and not make hasty decisions in terms 33 of a command decision, I when I went there, I had 34 pack to working in and not make hasty decisions in terms 35 pALP (any working in and not make hasty decisions in terms 36 pAL Cown when decision to close Wissinoning 37 pAL down because of the conditions of the center. 39 Q. Okay, When did you close Wissinoning 30 pAL down because of the conditions of the center. 30 Q. Okay, When did you close wissinoning 31 pAL down because of the conditions of the center. 32 A. The first thing when I walked into that 33 active center of the paperwork and asked me can I 34 the habeton turning in and the warden and commanding officer. 34 A. Wes. 35 pack day 36 pack day 37 pack day 38 pack day 39 pack day 39 pack day 30	9	A. No.	9	I'm to sorry to interrupt you. Who said not to say
12 A. No. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 Whan you started as commanding officer. 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go vieit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers' and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 those PAL centers of all, you know, all 26 needed to be done at the centers. So we went to do 27 an inspection of the centers and to meet the 28 inspecting the centers? 29 A. We visited a few centers the first day. 29 the time we got to Missinoming PAL, that center 30 inspecting the centers? 40 Q. And what happened when you were 41 feeling and I went book a few and I think it was next day or two days later and I met with Officer 42 the backlog. There was a decision to close Wissinoming 43 the back of the conditions of the center. 44 Q. Okay. When did you close Wissinoming 45 PAL? 46 A. This was when I first arrived at PAL 47 like that within that first or second week of me 48 being the commanding officer. 48 being the commanding officer. 49 Okay, when did you close the center? 40 Okay, and why did you close the center? 41 Q. Okay, When did you close Wissinoming 42 PAL 43 the backlog. There was puddles of water 44 the back one transport of the center to the center and there was closed and that's why it had a foul probably a foul smell. At that would be done at the centers and the center was closed and that's why it had a foul probably a foul smell. At that would be done at the centers? 5 next day or two days later and I met with Officer 6 A. We visited a few centers in terms 10 of a command decision, I when I went there, I had 11 in choice but to make a decision to close Rissinoming 12 PAL 5 A. This was whe	12 A. No. 13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer, 17 what — what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 those PAL centers; and, two, to look at facilities to 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 inspection of the centers and to meat the 26 Q. And what happened when you were 27 an inspection of the centers? 28 A. We visited a few centers the first day. 29 G. And what happened when you were 30 I'm working in and not make a decision to close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL. 17 like that — within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 extens godor of what I believe was mold and I couldn't 23 take the smell of the beliding, so I had to run out 24 the heart of the page very serious percents and the center. 25 those PAL were composition to the center. 26 A. The first thing when I walked into that 27 else me and the center was closed and that's why 28 three years reporting the conditions of the center. 29 A. The first arrived at PAL. 20 Okay, Mhen did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 extens godor of what I believe was mold and I couldn't 28 take the smell of the building, so I had to run out 29 the page very thing the commanding officer. 20 The page very thing the composition and even the center of the conditions of the center. 21 A. This was when I first arrived at PAL. 22 those PAL the first thing when I walked into that 23 tak	10	Q. If you were to have missed a meeting	10	anything, you just cut out a little bit?
13 to his mouth as shush, don't say anything and he was 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer. 17 What what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 asce what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 inspection of the centers. So we went to do 26 inspecting the centers? 27 A. We visited a few centers the first day. 28 by the time we got to Wissinoming PAL, that center 29 though it's my practice to learn about the unit that 210 I'm working in and not make hasty decisions in terms 211 of a command decision, I when I went there, I had 212 no choice but to make a decision to close wissinoming 213 PAL down because of the conditions of the center. 215 PAL? 216 A. This was when I first arrived at PAL 217 like don't say anything. 218 like thoi's say anything. 218 like thoi's say anything. 219 A. And just for the react yaunything and he was 21 like don't say anything. 20 And just for the react yaunything. 21 A. And just for the react youn're 20 And just for the react yaunything. 21 And just for the react yaunything. 21 And just for the react yaunything. 22 And just for the react yaunything. 22 And just for the react yaunything. 23 And just for the react yaunything. 24 Chail it don't say anything. 25 And just for the react yaunything. 26 A. Myew Indicating with your hand towards your neck sort of 29 May. 29 An inspecting fm cotion? 20 A. Yes. 21 A. He was going like that (indicating). 21 A. Right. Right. 22 Q. Mouth to lips. 23 A. Right. Right. 24 that the center that he kids were all Page 25 A. Right. Right. 25 One A. We wished to be enters and to meet the 26 A. We visited a few centers the first day. 27 A that a feut	13 Q. Okay. So let's back up again and let's 14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16	11	would anybody have gone in your place?	11	A. Ted Qualli was signaling, I caught him
talk about when you were first appointed to become a to commanding officer of PAL. Mhen you started as commanding officer, what what did you do? Can you tell us again a little bit about your first weak there? A. When I first arrived at PAL, we decided to go visit all the PAL centers so that I can get to those PAL centers; and, two, to look at facilities to as see what's going on in terms of all, you know, all an inspection of the centers and to meet the an inspecting the centers? A. We visited a few centers the first day. The bit mew got to Wissinoming PAL, that center sitself was in real deplorable conditions and even to random it would not make hasty decisions in terms of a command decision, I when I went there, I had commanding officer. A. This was when I first arrived at PAL like that within that first or second week of me being the commanding officer. A. The first thing when I walked into that log O, Okay, and why did you close the center? A. The first thing when I walked into that log O, Okay, and why did you close the center? A. The first thing when I walked into that log O, Okay, and why did you close the center? A. The first thing when I walked into that log O, Okay, and why did you close the center? A. The first thing when I walked into that log O, Okay, and why did you close the center? A. The first thing when I walked into that log O, Okay, and why did you close the center? A. The first thing when I walked into that log O, Okay, and why did you close the center? A. He was going like that (indicating). A. He was going like that (indicating). A. Right. Right. So Ted Qualli began to the way that I was doing events and the center that the kids were all log O, Month to lips. A. Right. Right. So Ted Qualli began to the lad a foul probably a foul seel. A. Right. Right. So Ted Qualli began to that a foul probably a foul seel. A. Right and I went back a few and I think it was feeling and I went back a few and I think it was feeling and I went back a few	14 talk about when you were first appointed to become a 15 commanding officer of PAL. 16 When you started as commanding officer. 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL. 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 inseeded to be done at the centers. So we went to do 26 an inspecting the centers? 27 an inspecting the centers? 28 timesedisting the centers? 29 A. We visited a few centers the first day. 29 By the time we got to Wissinoming PAL, that center 29 though it's my practice to learn about the unit that 21 or holder but to make a decision to close Wissinoming 21 PAL? 22 D. Okay. 23 those PAL centers and to meet the 24 the backlog. There was a backlog of things that 25 those PAL centers? and, two, to look at facilities to 26 Q. Mouth to lips. 27 A. Right. Right. So Ted Qualli began to 28 the that center are that the center that the kids were all 29 an inspecting of the centers. 30 afficers. 31 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 inspecting the centers? 4 Q. And what happened when you were 5 inspecting the centers? 5 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 timeliately in and not make hasty decisions in terms 10 of a command decision, I when I went there, I had 11 T'en working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay, Mhen did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19	12	A. No.	12	with my peripheral, the sergeant putting his finger
15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 kmow the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 an inspection of the centers. So we went to do 26 an inspection of the centers and to meet the 37 officers. 4 Q. And what happened when you were 4 inspecting the centers? 4 Q. And what happened when you were 5 inspecting the centers? 5 A. We visited a few centers the first day. 8 by the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL. 17 like that within that first or second week of me 18 being the commanding officer. 19 Like don't say anything. 10 I'm dorking in the decided of the center of indicating with your hand towards your neck sort of making a cutting off motion? 18 making a cutting off motion? 19 A. Yes. 20 Okay. A. He was going like that (indicating). 20 Okay. A. Right. So Ted Qualli began to 20 Okay. A. Right Right. So Ted Qualli began to 21 the that the center that the kids were all and the what the center and the center was closed and that's why 21 thad a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 7 to which the Closer. 7 to which the Condit	15 commanding officer of PAL. 16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 those PAL centers; and, two, to look at facilities to 26 needed to be done at the centers. So we went to do 27 needed to be done at the centers. So we went to do 28 an inspection of the centers and to meet the 39 officers. 40 Q. And what happened when you were 41 in growth it's my practice to learn about the unit that 40 Q. Way. When did you close Wissinoming 41 Phat? 42 A. This was when I first arrived at PAL 43 Phat? 44 Q. OKay, When did you close Wissinoming 45 Phat? 46 A. This was when I first arrived at PAL 47 Phat? 48 Phat? 49 A. The first thing when I walked into that 49 Q. OKay, and why did you close the center? 40 Q. OKay, and why did you close the center? 41 Q. OKay, and why did you close the center? 42 A. The first thing when I walked into that 43 being the commanding officer. 44 Q. OKay, and why did you close the center? 45 A. The first thing when I walked into that 46 Q. OKay, and why did you close the center? 47 A. The first thing when I walked into that 48 Decide the paperwork walked were getting sick and being the commanding officer. 49 Q. OKay, and why did you close the center? 40 Q. OKay, and why did you close the center? 41 Q. OKay, and why did you close the center? 42 A. The first thing when I walked into that 43 Decide the swell of the building, so I had to run out 44 Decide the paperwork and asked me can I	13	Q. Okay. So let's back up again and let's	13	to his mouth as shush, don't say anything and he was
16 When you started as commanding officer, 17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 2 n needed to be done at the centers. So we went to do 2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 20 Q. And just for the record you're 16 aking a cutting off motion? 18 making a cutting off motion? 19 A. Yes. 20 Q. Okay. 20 Q. Okay. 21 A. He was going like that (indicating). 22 Q. Mouth to lips. 22 Q. Mouth to lips. 23 A. Right. Right. So Ted Qualli began to tell me that the kids were all 24 bell me that the center that the kids were all 25 doing events and the center was closed and that's why 21 thad a foul probably a foul smell. At that 29 point we had to leave because of the way that I was 39 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer assigned to that center, 31 at which time Officer wassigned to that center was closed and that's why 31	When you started as commanding officer, the what did you do? Can you tell us again a little bit about your first week there? A. When I first arrived at PAL, we decided to go visit all the PAL centers so that I can get to go visit all the PAL centers so that I can get to look a specific so the package. A. When I first arrived at PAL, we decided to go visit all the PAL centers so that I can get to look at facilities to look at facilities to look at facilities to look at facilities to look at the backlog. There was a backlog of things that look the package. A. We wisited a few centers. So we went to do look an inspection of the centers. A. We visited a few centers the first day. By the time we got to Wassinoming PAL, that center little bit about your first week there? Command decision, I when I went there, I had look a command decision, I when I went there, I had look a command decision, I when I went there, I had look a command decision, I when I went there. A. This was when I first arrived at PAL look and what happened who you close Missinoming look package of the conditions of the center. A. This was when I first arrived at PAL look and what happened who was the look a few and I think it was look package of the conditions of the center. A. This was when I first arrived at PAL look because of the conditions of the center. A. The first thing when I walked into that look and you close Missinoming look package and the way that I was look a few and I think it was look the way that I was feeling and I went back a few and I think it was look the way that I was feeling and I went back a few and I think it was look the way that I was feeling and I went back a few and I think it was look the way that I was feeling and I went back a few and I think it was look the way that I was feeling and I went back a few and I think it was look the way that I was feeling and I went back a few and I think it was look the way that I was look feel methat the center was closed and that swhy look feeli	14	talk about when you were first appointed to become a	14	going like this telling him to stop talking about it,
17 what what did you do? Can you tell us again a 17 lindicating with your hand towards your neck sort of 18 little bit about your first week there? 18 making a cutting off motion? 19 A. Yes. 20 O. Okay. 21 know the one, get to know the officers working at 21 know the one, get to know the officers working at 22 those PAL centers: and, two, to look at facilities to 22 Q. Mouth to lips. 23 A. Right. Right. So Ted Qualli began to 24 the backlog. There was a backlog of things that 24 the backlog. There was a backlog of things that 24 the backlog. There was a backlog of things that 24 the backlog. There was a backlog of things that 25 A. Right. Right. So Ted Qualli began to 26 the backlog. There was a backlog of things that 26 doing events and the center that the kids were all 27 doing events and the center was closed and that's why 28 inspecting the centers? 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 inspecting the centers? 6 A. We visited a few centers the first day. 5 point we had to leave because of the way that I was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was 6 feeling and I went back a few and I think it was feeling and I went back a few and I think it was feeling and I went back a few and I think it was feeling and I went back a few and I think it was feeling and I went back a few and I think it was feeling and I went back a few and	17 what what did you do? Can you tell us again a 18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 the backlog. There was a backlog of things that 26 an inspection of the centers and to meet the 27 an inspecting the centers and to meet the 38 inspecting the centers? 4 Q. And what happened when you were 4 inspecting the centers? 5 inspecting the centers? 6 A. Ne visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 21 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 24 the backlog. The PAL centers and the extert was a copy of the paperwork and aeked me can I 25 the daff foul probably a foul smell. At that 26 doing events and the center as a Closed and that's why? 27 the daff of the center and the center and I met with Officer 28 to had a foul probably a foul smell. At that 39 joint we had to leave because of the was the officer susping and I went back a few and I think it was 4 feeling and I went back a few and I think it was 5 next day or two days l	15	commanding officer of PAL.	15	like don't say anything.
18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 26 the backlog. There was a backlog of things that 27 needed to be done at the centers. So we went to do 28 an inspection of the centers and to meet the 29 officers. 30 officers. 4 Q. And what happened when you were 4 feeling and I went back a few and I think it was 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 10 a command decision, I when I went there, I had 11 The working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 Q. Okay. When did you close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. He was going like that (indicating). 21 A. He was going like that (indicating). 22 Q. Mouth to lips. 22 A. Right. Right. So Ted Qualli began to 24 tell me that the center that the kids were all 23 A. Right. Right. So Ted Qualli began to 24 tell me that the center that the kids were all 25 an inspection of the center was closed and that's why 26 till me that the center that the kids were all 27 A. Wouth to lips. 28 A. Right. Right. So Ted Qualli began to 29 though the that the center that the kids were all 29 an inspection of the centers. 30 Page 20 1 doing	18 little bit about your first week there? 19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 tell me that the center that the kids were all 26 needed to be done at the centers. So we went to do 27 an inspection of the centers and to meet the 38 officers. 4	16	When you started as commanding officer,	16	Q. And just for the record you're
19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 the backlog. There was a backlog of things that 26 inspection of the centers. So we went to do 27 an inspection of the centers and to meet the 28 inspecting the centers? 29 A. Right. Right. So Ted Qualli began to 29 the backlog. There was a backlog of things that 20 an inspection of the centers and to meet the 21 in needed to be done at the centers. So we went to do 22 an inspection of the centers and to meet the 23 officers. 30 officers. 4 Q. And what happened when you were 4 feeling and I went back a few and I think it was 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL? 14 Q. Okay. When did you close Wissinoming 15 PAL? 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. Right. Right. Right. So Ted Qualli bethat (indicating). 21 A. Right. Right. Right. So Ted Qualli bethat the center that the kids were getting asthma 22 A. Right. Right	19 A. When I first arrived at PAL, we decided 20 to go visit all the PAL centers so that I can get to 21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 inseeded to be done at the centers. So we went to do 26 an inspection of the centers and to meet the 37 officers. 38 officers. 49 Q. And what happened when you were 40 fineeded to be done at the centers the first day. 40 First time we got to Wissinoming PAL, that center 41 I'm working in and not make hasty decisions in terms 42 I'm working in and not make hasty decisions in terms 43 I of a command decision, I when I went there, I had 44 Q. Okay. When did you close Wissinoming 45 PAL down because of the conditions of the center. 46 Q. Okay. When did you close Wissinoming 47 PAL down because of the conditions of the center. 48 PAL down because of the conditions of the center. 49 PAL down because of the conditions of the center. 40 Q. Okay. When did you close Wissinoming 41 PAL down because of the conditions of the center. 41 Q. Okay. When did you close Wissinoming 42 PAL down because of the conditions of the center. 43 PAL down because of the conditions of the center. 44 Q. Okay. When did you close the center. 45 PAL? 46 PAL down because of the conditions of the center. 47 PAL down because of the conditions of the center. 48 PAL down because of the conditions of the center. 49 PAL down because of the conditions of the center. 40 PAL down because of the conditions of the center. 41 PAL down because of the conditions of the center. 42 PAL down because of the conditions of the center. 43 PAL down because of the conditions of the center. 44 PAL down because of the conditions of the center. 45 PAL down because of the conditions of the center. 46 PAL down because of the conditions of the center. 47 PAL down because of the conditions of the center. 48 PAL down because of the conditions of the center.	17	what what did you do? Can you tell us again a	17	indicating with your hand towards your neck sort of
to go visit all the PAL centers so that I can get to 20	to go visit all the PAL centers so that I can get to know the one, get to know the officers working at know the one, get to know the officers working at those PAL centers; and, two, to look at facilities to see what's going on in terms of all, you know, all the backlog. There was a backlog of things that the backlog. There was a backlog of things that needed to be done at the centers. So we went to do an inspection of the centers and to meet the a officers. Q. And what happened when you were inspecting the centers? A. We visited a few centers the first day. By the time we got to Wissinoming PAL, that center titself was in real deplorable conditions and even by though it's my practice to learn about the unit that I'm working in and not make hasty decisions in terms of a command decision, I when I went there, I had I'm working in and not make hasty decisions in terms of a command decision, I when I went there, I had I on choice but to make a decision to close Wissinoming PAL A. This was when I first arrived at PAL A. This was when I first arrived at PAL A. This was when I first arrived at PAL A. The working in and not work and why did you close the center? A. The first thing when I walked into that center I immediately got sick because these was a strong odor of what I believe was mold and I couldn't at the had a foul probably a foul small. At that Do in we had to leave because of the way that I was feeling and I went back a few and I think it was heat day or two days later and I met with Officer Younger who was the officer assigned to that center, at which time Officer Younger took me around the center with a mask on to show me the conditions of the center and there was mold in the classroom, the closet, a wall in front of the closet. There was closet, a wall in front of the closet. There was closet, a wall in front of the conditions of the center to The Quellar of the conditions of the center to The Quellar of the was an end of the center to A. The fir	18	little bit about your first week there?	18	making a cutting off motion?
21 know the one, get to know the officers working at 22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 needed to be done at the centers. So we went to do 26 an inspection of the centers and to meet the 27 an inspection of the centers and to meet the 28 officers. 29 And what happened when you were 29 in inspecting the centers? 20 And what happened when you were 30 inspecting the centers? 31 by the time we got to Wissinoming PAL, that center 32 though it's my practice to learn about the unit that 33 off a command decision, I when I went there, I had 34 feeling and I went back a few and I think it was 35 inspecting the centers? 36 A. We visited a few centers the first day. 37 by the time we got to Wissinoming PAL, that center 38 itself was in real deplorable conditions and even 49 though it's my practice to learn about the unit that 40 I'm working in and not make hasty decisions in terms 41 O Coap. When did you close Wissinoming 42 the backlog. There was a backlog of things that 42 tell me that the center that the kids were all 42 tell me that the center that the kids were all 43 doing events and the center was closed and that's why 44 tell me that the center that the kids were all 45 tell me that the center that the kids were all 46 oning events and the center that the kids were all 46 tell me that the center that the kids were all 46 tell me that the center that the kids were all 46 tell me that the center that the kids were all 47 that a foul probably a foul smell. At that 48 feeling and I went back a few and I think it was 49 feeling and I went back a few and I think it was 49 feeling and I went back a few and I think it was 59 the time we got to Wissinoming Pale to the ward to the ward the center was the officer assigned to that center, 59 the center with a mask on to show me the conditions of the center was mold in the classroom, the closet, a wall in	21 know the one, get to know the officers working at those PAL centers; and, two, to look at facilities to 22 Q. Mouth to lips. 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 24 tell me that the center that the kids were all 25 the backlog. There was a backlog of things that 26 tell me that the center that the kids were all 27 tell me that the center that the kids were all 28 tell me that the center that the kids were all 29 the backlog. There was a backlog of things that 29 the backlog. There was a condensation in the gran. There was puddles of water 10 closer, a wall in front of the closer. There was 11 condensation in the gran. There was puddles of water 12 the contens of the center 13 the back a feet in a which time officer younger took me around the 20 closer, a wall in front of the closer. There was 20 cannot a which time officer younger took me around the 21 the which time officer	19	A. When I first arrived at PAL, we decided	19	A. Yes.
22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 page 20 1 needed to be done at the centers. So we went to do 26 an inspection of the centers and to meet the 27 an inspection of the centers and to meet the 28 inspecting the centers? 29 And what happened when you were 29 finished it is all was in real deplorable conditions and even 29 though it's my practice to learn about the unit that 20 no choice but to make a decision to close Wissinoming 20 Page 20 1 doing events and the center was closed and that's why 21 thad a foul probably a foul smell. At that she feeling and I went back a few and I think it was next day or two days later and I met with Officer 4 younger who was the officer assigned to that center, at which time Officer Younger took me around the shough it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	22 those PAL centers; and, two, to look at facilities to 23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 needed to be done at the centers. So we went to do 26 an inspection of the centers and to meet the 27 an inspection of the centers and to meet the 28 officers. 29 an inspection of the centers and to meet the 30 officers. 30 officers. 40 Q. And what happened when you were 41 inspecting the centers? 41 A. We visited a few centers the first day. 42 by the time we got to Wissinoming PAL, that center 43 itself was in real deplorable conditions and even 45 though it's my practice to learn about the unit that 46 center with a mask on to show me the conditions of the center with a mask on to show me the conditions of the center with a mask on to show me the conditions of the center with a mask on to show me the conditions of the center with a mask on to show me the closet. There was condensation in the gym. There was puddles of water in thick of paperwork which contained memos that he had been turning in and pictures for the previous three years reporting the conditions of the center to 18 being the commanding officer. 10 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing the kids to the center, and he himself had gotten 21 respiratory problems for working in the center. And 23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork and asked me can I	20	to go visit all the PAL centers so that I can get to	20	Q. Okay.
23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25	23 see what's going on in terms of all, you know, all 24 the backlog. There was a backlog of things that 25 needed to be done at the centers. So we went to do 26 an inspection of the centers and to meet the 27 an inspection of the centers and to meet the 28 officers. 29 an inspection of the centers and to meet the 30 officers. 30 officers. 40 Q. And what happened when you were 41 feeling and I went back a few and I think it was inspecting the centers? 41 A. We visited a few centers the first day. 42 feeling and I went back a few and I think it was next day or two days later and I met with Officer 43 officers. 44 V. And what happened when you were 45 inspecting the centers? 46 A. We visited a few centers the first day. 47 By the time we got to Wissinoming PAL, that center 48 itself was in real deplorable conditions and even 49 though it's my practice to learn about the unit that 40 I'm working in and not make hasty decisions in terms 40 I'm working in and not make hasty decisions in terms 41 O. Okay. When did you close Wissinoming 42 DAL down because of the conditions of the center. 43 An inch thick of paperwork which contained memos that 44 Q. Okay, and why did you close Wissinoming 45 This was when I first arrived at PAL 46 A. This was when I first arrived at PAL 47 Ilke that within that first or second week of me 48 being the commanding officer. 49 Q. Okay, and why did you close the center? 40 A. The first thing when I walked into that 41 center I immediately got sick because there was a 42 strong odor of what I believe was mold and I couldn't 42 tell me that the center that the kids were all 41 doing events and the center was closed and that's why 41 doing events and the center was closed and that's why 42 doing events and the center was closed and that's why 4 feeling and I went back a few and I think it was 4 feeling and I went back a few and I think it was 4 feeling and I went back a few and I wint officer 4 Younger two days later and I met with Officer 5 Younger who was the officer Y	21	know the one, get to know the officers working at	21	A. He was going like that (indicating).
the backlog. There was a backlog of things that 24 tell me that the center that the kids were all Page 20 1 needed to be done at the centers. So we went to do 2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 20 Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 doing events and the center that the kids were all 22 doing events and the center was closed and that's why 23 thad a foul probably a foul smell. At that 24 tell me that the center that the kids were all 24 tell me that the center that the kids were all 24 doing events and the center was closed and that's why 2 it had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 by the did you of two days later and I met with Officer 8 Younger who was the officer assigned to that center, 9 Younger who was the officer assigned to that center, 14 two which officer assigned to that center, 15 younger who was the officer assigned to that center, 16 Younger who was the officer assigned to that center, 18 two hich time Officer assigned to that center, 19 the center and there was mold in the classrom, the 10 closet, a wall in front of the closet. There was 11 condensation in the gym. There was puddles of water 12 in different parts	24 the backlog. There was a backlog of things that 24 tell me that the center that the kids were all 25 needed to be done at the centers. So we went to do 26 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 of a command decision, I when I went there, I had 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 18 Decided to be done at the centers. And 24 tell me that the center that the kids were all Page 22 1 doing events and the center was closed and that's why 2 it had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 7 ounger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 different parts of the gym. There was puddles of water 12 in different parts of the gym. There was puddles of water 13 an inch thick of paperwork which contained memos that 14 be had been turning in and pictures for the previous 15 PAL? 16 A. This was when I first arrived at PAL 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 parents were complaining the kids were getting asthma 20 A. The	22	those PAL centers; and, two, to look at facilities to	22	Q. Mouth to lips.
1 needed to be done at the centers. So we went to do 2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 if a command decision, I when I went there, I had 11 pAL down because of the conditions of the center. 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 20 Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 doing events and the center was closed and that's why 22 it had a foul probably a foul smell. At that 22 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 9 closet, a wall in front of the closet. There was 11 condensation in the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 he had been turning in and pictures for the previous 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	1 needed to be done at the centers. So we went to do 2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 24 doing events and the center was closed and that's why 2 it had a foul probably a foul smell. At that 2 it had a foul probably a foul smell. At that 2 it had a foul probably a foul smell. At that 2 it had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 condensation in the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17	23	see what's going on in terms of all, you know, all	23	A. Right. Right. So Ted Qualli began to
1 needed to be done at the centers. So we went to do 2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 20 Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 doing events and the center was closed and that's why 22 it had a foul probably a foul smell. At that 22 it had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 4 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 6 center with a mask on to show me the conditions of 7 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 condensation in the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 Ted Qualli, Sunny Li and the warden. 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 19 and respiratory problems and they stopped bringing	1 needed to be done at the centers. So we went to do 2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 11 no choice but to make a decision to close Wissinoming 13 FAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 diake the smell of the building, so I had to run out 2 doing events and the center was closed and that's why 2 dit had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 6 center with a mask on to show me the conditions of 7 the center was mold in the classroom, the 8 closet, a wall in front of the closet. There was 11 on indifferent parts of the gym, and he gave me about 12 in different parts of the gym, and he gave me about 13 fall down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 and respiratory problems and they stopped bringing 19 the kids to the center, and he himself had gotten 19 respiratory problem	24	the backlog. There was a backlog of things that	24	tell me that the center that the kids were all
2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 2 it had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 condensation in the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	2 an inspection of the centers and to meet the 3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 9 PAL? 10 A. This was when I first arrived at PAL 11 like that within that first or second week of me 12 being the commanding officer. 13 D. Okay, and why did you close the center? 14 C. Okay, and why did you close the center? 15 D. Okay, and why did you close the center? 16 A. The first thing when I walked into that 17 center I immediately got sick because there was a 18 take the smell of the building, so I had to run out 2 it had a foul probably a foul smell. At that 2 it had a foul probably a foul smell. At that 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer Younger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 of a command decision, I when I went there, I had 12 on choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 being the commanding officer. 18 And he told me that it used to be an 19 active center but that the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 t	1		1	Page 22
3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 officers. 3 point we had to leave because of the way that I was 4 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 6 Younger who was the officer vounger took me around the 6 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 closet, a wall in front of the closet. There was 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 Ted Qualli, Sunny Li and the warden. 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing	3 officers. 4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 4 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 20 Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 24 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 4 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 condensation in the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 take the smell of the building, so I had to run out				
Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 the first thing when I walked into that 22 the feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 7 vounger who was the officer assigned to that center, 7 at which time Officer sounger took me around the 8 center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 in different parts of the gym, and he gave me about 12 an inch thick of paperwork which contained memos that 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 Like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	4 Q. And what happened when you were 5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 24 feeling and I went back a few and I think it was 5 next day or two days later and I met with Officer 7 Younger who was the officer assigned to that center, 6 the vist day or two days later and I met with Officer 7 Younger who was the officer assigned to that center, 6 they on the day or two days later and I met with Officer 7 Younger who was the officer assigned to that center, 6 they on the time of inter with a mask on to show me the conditions of 7 the center yith a mask on to show me the conditions of 8 the center yith a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 10 the center with a mask on to show me the conditions of 11 the center with a mask on to show me the conditions of 12 the center and I met with Officer 13 at which time Officer 14 which time Officer Younger took me around the 15 center with a mask on to show me the conditions of 16 the center, and there was mold in the classroom, the 10 closet, a wall in front of the closet. 11 an inch thick of paperwork which contained memos that 12 the had been turning in and pictures for the pre				
5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 being the commanding officer 22 and respiratory problems and they stopped bringing	5 inspecting the centers? 6 A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 25 hat can be enter and there was in least with officer 26 Younger who was the officer assigned to that center, 27 ta which time Officer Younger took me around the 28 center with a mask on to show me the conditions of 29 the center with a mask on to show me the conditions of 40 the center with a mask on to show me the conditions of 41 the center and there was mold in the classroom, the 42 thick time Officer Younger took me around the 42 the which time Officer Younger took me around the 43 take the smell of the building, so I had to run out 44 thich time Officer Younger took me around the 45 center with a mask on to show me the conditions of 46 the center with a mask on to show me the conditions of 48 center with a mask on to show me the conditions of 49 the center with a mask on to show me the conditions of 40 center with a mask on to show me the conditions of 40 center with a mask on to show me the conditions of 40 center with a mask on to show me the conditions of 40 center with a mask on to show me the conditions of 40 closet, a wall in front of the closet. There was pondense. 10 the center with a wask on to show me the conditions o				
A. We visited a few centers the first day. By the time we got to Wissinoming PAL, that center itself was in real deplorable conditions and even though it's my practice to learn about the unit that I 'm working in and not make hasty decisions in terms of a command decision, I when I went there, I had paralled down because of the conditions of the center. PAL? A. This was when I first arrived at PAL This was when I first or second week of me Q. Okay, and why did you close the center? A. The first thing when I walked into that Younger who was the officer assigned to that center, at which time Officer Younger took me around the center with a mask on to show me the conditions of the center with a mask on t	A. We visited a few centers the first day. 7 By the time we got to Wissinoming PAL, that center 8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 24 Younger who was the officer assigned to that center, 7 at which time Officer Younger took me around the 8 center with a mask on to show me the conditions of the center with a mask on to show me the conditions of 8 center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 10 center with a mask on to show me the conditions of 11 the center with a mask on to show me the conditions of 12 center with a mask on to show me the conditions of 13 center with a mask on to show me the conditions of 24 center with a mask on to show me the conditions of 25 center with a mask on to show me the conditions of 26 center with a mask on to show me the conditions of 27 coloset, a wall in front of the closet. There was 28 canter with a mask on to show me the conditions of 29 the center with a mask on to show me the conditions of 20 coloset, a wall in front of the closet. There was 21 the kids to the center, and he himself had gotten 22 the kids to the center, and he himself had gotten 23 take the smell of the building, so I had to run out		7		-
8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 28 center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 or different parts of the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 strong odor of what I believe was mold and I couldn't 23 he gave me a copy of the paperwork and asked me can I	6	A. We visited a few centers the first day.		
8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	8 itself was in real deplorable conditions and even 9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 28 center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center with a mask on to show me the conditions of 9 the center and there was mold in the classroom, the 10 closet, a wall in front of the closet. There was 11 or different parts of the gym. There was puddles of water 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 strong odor of what I believe was mold and I couldn't 23 he gave me a copy of the paperwork and asked me can I	7	By the time we got to Wissinoming PAL, that center	7	at which time Officer Younger took me around the
9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	9 though it's my practice to learn about the unit that 10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 20 the center and there was mold in the classroom, the 21 closet, a wall in front of the closet. There was 21 condensation in the gym. There was puddles of water 22 the decision in the gym. There was puddles of water 23 the center and there was mold in the classroom, the 24 closet. There was 25 the center and there was mold in the classroom, the 26 closet, a wall in front of the closet. There was 26 the center and there was mold in the classroom, the 27 the closet. 28 the center and there was mold in the closet. There was 29 closet, a wall in front of the closet. There was 29 the condensation in the gym. There was puddles of water 29 the center bugsment of the gym, and he gave me about 29 the center and there was mold in the closet. There was 20 closet, a wall in front of the closet. There was 20 the gym. There was puddles of water 20 the gym, and he gave me about 21 the had been turning in and pictures for the previous 22 three years reporting the conditions of the center to 23 the had been turning in and pictures for the previous 24 the had been turning in and pictures for the previous 25 three years reporting the conditions of the center to 26 Ted Qualli, Sunny Li and the warden. 27 and he told me that it used to be an 28 active center but that the kids were getting asthma 29 and respiratory problems and t				
10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 condensation in the gym. There was puddles of water 22 in different parts of the gym, and he gave me about 23 an inch thick of paperwork which contained memos that 24 he had been turning in and pictures for the previous 25 three years reporting the conditions of the center to 26 Ted Qualli, Sunny Li and the warden. 27 And he told me that it used to be an 28 active center but that the kids were getting asthma 29 and respiratory problems and they stopped bringing	10 I'm working in and not make hasty decisions in terms 11 of a command decision, I when I went there, I had 12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 20 closet, a wall in front of the closet. There was 21 condensation in the gym. There was puddles of water 22 in different parts of the gym, and he gave me about 23 an inch thick of paperwork which contained memos that 24 he had been turning in and pictures for the previous 25 three years reporting the conditions of the center to 26 Ted Qualli, Sunny Li and the warden. 27 And he told me that it used to be an 28 active center but that the kids were getting sick and 29 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 take the smell of the building, so I had to run out 24 he had been turning in and pictures for the previous 25 three years reporting the conditions of the center to 26 Ted Qualli, Sunny Li and the warden. 27 And he told me that it used to be an 28 active center but that the kids were getting asthma 29 and respiratory problems and they stopped bringing 20 the kids to the center, and he himself had gotten 21 the kids to the paperwork and asked me can I				
of a command decision, I when I went there, I had no choice but to make a decision to close Wissinoming PAL down because of the conditions of the center. Q. Okay. When did you close Wissinoming PAL? A. This was when I first arrived at PAL like that within that first or second week of me being the commanding officer. Q. Okay, and why did you close the center? Q. Okay, and why did you close the center? Q. Okay, and why did you close the center? A. The first thing when I walked into that In condensation in the gym. There was puddles of water in different parts of the gym, and he gave me about an inch thick of paperwork which contained memos that he had been turning in and pictures for the previous three years reporting the conditions of the center to Ted Qualli, Sunny Li and the warden. And he told me that it used to be an active center but that the kids were getting sick and parents were complaining the kids were getting asthma and respiratory problems and they stopped bringing	of a command decision, I when I went there, I had no choice but to make a decision to close Wissinoming 12 in different parts of the gym, and he gave me about 13 PAL down because of the conditions of the center. 13 an inch thick of paperwork which contained memos that 14 Q. Okay. When did you close Wissinoming 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 A. This was when I first arrived at PAL 16 Ted Qualli, Sunny Li and the warden. 17 like that within that first or second week of me 18 being the commanding officer. 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork and asked me can I				
no choice but to make a decision to close Wissinoming PAL down because of the conditions of the center. Q. Okay. When did you close Wissinoming PAL? A. This was when I first arrived at PAL like that within that first or second week of me being the commanding officer. Q. Okay, and why did you close the center? Q. Okay, and why did you close the center? Q. Okay, and why did you close the center? A. The first thing when I walked into that 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing	12 no choice but to make a decision to close Wissinoming 13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 20 Land to contained memos that 11 an inch thick of paperwork which contained memos that 12 in different parts of the gym, and he gave me about 13 an inch thick of paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork and asked me can I				
PAL down because of the conditions of the center. 13 an inch thick of paperwork which contained memos that 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? Q. Okay, and why did you close the center? A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	13 PAL down because of the conditions of the center. 14 Q. Okay. When did you close Wissinoming 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork which contained memos that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
Q. Okay. When did you close Wissinoming 14 he had been turning in and pictures for the previous 15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? Q. Okay, and why did you close the center? A. The first thing when I walked into that 14 he had been turning in and pictures for the previous 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing	Q. Okay. When did you close Wissinoming PAL? A. This was when I first arrived at PAL like that within that first or second week of me being the commanding officer. Q. Okay, and why did you close the center? A. The first thing when I walked into that center I immediately got sick because there was a strong odor of what I believe was mold and I couldn't three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. And he told me that it used to be an active center but that the kids were getting sick and parents were complaining the kids were getting asthma and respiratory problems and they stopped bringing the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 take the smell of the building, so I had to run out 24 he had been turning in and pictures for the previous three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an active center but that the kids were getting asthma 24 and respiratory problems and they stopped bringing 25 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 27 active center but that the kids were getting asthma 28 and respiratory problems and they stopped bringing 29 the kids to the center, and he himself had gotten 20 respiratory problems for working in the center. And 21 he had been turning in and pictures for the previous		_		
15 PAL? 16 A. This was when I first arrived at PAL 16 Ithree years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 Iike that within that first or second week of me 17 And he told me that it used to be an 18 being the commanding officer. 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	15 PAL? 16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 15 three years reporting the conditions of the center to 16 Ted Qualli, Sunny Li and the warden. 17 And he told me that it used to be an 18 active center but that the kids were getting sick and 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	16 A. This was when I first arrived at PAL 17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 26 Ted Qualli, Sunny Li and the warden. 27 And he told me that it used to be an 28 active center but that the kids were getting sick and 29 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
17 like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 19 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	like that within that first or second week of me 18 being the commanding officer. 19 Q. Okay, and why did you close the center? 20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 26 And he told me that it used to be an 27 active center but that the kids were getting sick and 28 active center but that the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
being the commanding officer. 18 active center but that the kids were getting sick and 19 Q. Okay, and why did you close the center? 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	being the commanding officer. Q. Okay, and why did you close the center? A. The first thing when I walked into that center I immediately got sick because there was a strong odor of what I believe was mold and I couldn't take the smell of the building, so I had to run out 18 active center but that the kids were getting sick and parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
Q. Okay, and why did you close the center? 19 parents were complaining the kids were getting asthma 20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	Q. Okay, and why did you close the center? A. The first thing when I walked into that center I immediately got sick because there was a strong odor of what I believe was mold and I couldn't take the smell of the building, so I had to run out 19 parents were complaining the kids were getting asthma 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
20 A. The first thing when I walked into that 20 and respiratory problems and they stopped bringing	20 A. The first thing when I walked into that 21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 20 and respiratory problems and they stopped bringing 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
	21 center I immediately got sick because there was a 22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 21 the kids to the center, and he himself had gotten 22 respiratory problems for working in the center. And 23 he gave me a copy of the paperwork and asked me can I				
1 1 1	22 strong odor of what I believe was mold and I couldn't 23 take the smell of the building, so I had to run out 24 respiratory problems for working in the center. And 25 he gave me a copy of the paperwork and asked me can I				
22 strong odor of what I believe was mold and I couldn't 22 respiratory problems for working in the center. And	23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork and asked me can I				·
1 1 -		l			
23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork and asked me can I	124]and throw up. I was throwing up outside and I was 124]please do something about these conditions, and he		and throw up. I was throwing up outside and I was		please do something about these conditions, and he
	23 take the smell of the building, so I had to run out 23 he gave me a copy of the paperwork and asked me can I	19 20 21	Q. Okay, and why did you close the center? A. The first thing when I walked into that center I immediately got sick because there was a	19 20 21	parents were complaining the kids were getting asthma and respiratory problems and they stopped bringing the kids to the center, and he himself had gotten
Indiana and the second of the	1041-03 (1)				

Г	Page 23		Page 25
1	explained to me that they told him that they couldn't	1	gave
2	close the center down because they were getting	2	A. To protect.
3	funding and explained to me that the funding that	3	Q you the authority
4	they were getting they were telling the donors that	4	A. Yes.
5	it was an active center, but the center was not	5	Q to protect, that's what gives you
6	active because only about 13 kids were attending the	6	authority to close the PAL center?
7	center because they didn't have anywhere to go after	7	A. And as the commanding officer of PAL, I
8	school and that's the only reason why they were	8	have the authority to protect my officers and the
9	coming, but the hundred plus kids that used to attend	9	children, that's priority.
10	stopped coming because of the conditions of the	10	Q. Okay. Before you closed I just want
11	center.	11	to make sure I'm understanding your testimony
12	In the walkway between the gym and the	12	correctly, before you closed the center down, you
13	classroom there was a sinkhole and they had a piece	13	contacted Deputy Commissioner Paterson?
14	of wood with a rug on top so the kids could walk over	14	A. Yes.
15	it to the classroom.	15	Q. And Deputy Commissioner Paterson
16	Q. Okay.	16	advised
17	A. So given the fact that it happened	17	A. And I spoke to Ted Qualli and he agreed
18	three years since this was going on, I felt that I	18	at the time.
19	needed to protect the children and the staff that	19	Q. Okay. So you spoke to Ted Qualli
20	entered that building; and, therefore, I made the	20	Qualli, excuse me, and you spoke with Deputy
21	decision to close the center down.	21	Commissioner Paterson and they agreed to the decision
22	Q. Okay. In terms of making the decision	22	to shut the PAL center down?
23	to close the center down, is that something you had	23	A. Deputy Commissioner Paterson agreed to
24	the authority to do as the commanding officer of PAL?	24	shut the center down. When I spoke to Ted Qualli
1	Page 24 A. Before I made the decision I spoke to		Page 26 about it he said well, let's shut it down until we
	Deputy Commissioner Paterson who told me that that	l l	found what's going on. But when we found out that it
	would be a great decision to close it down because	l l	would be a lot money to correct the problems he
	after explaining to him what was going on he said	l l	attempted to reopen up the center by undermining my
	that's the only thing you can do is the safety of	l l	decision and going to the sergeants and telling them
	the kids and the safety of the officers are more	l l	to reopen up the center without consulting me about
7	important than funding. So he instructed me that	7	it.
8	you know, he was giving me permission to shut it	8	Q. Okay.
	down.	9	A. When I back to the center, the officer
10	Q. Okay. So I appreciate your answer, but	l l	was there with a mask on trying to clean the mold so
	I don't think you quite answered my question. As the		that they could open the center. And when I asked
	commanding officer of PAL did you have the authority	l l	him why he was trying to open up the center, he said
	to shutdown a PAL center?	l l	because the sergeant said to reopen or Ted Qualli.
14	A. Yes.	l l	And I immediately called Ted Qualli and the sergeants
15	Q. Okay. Was that in any writing or	ΙI	to come and meet me at Wissinoming PAL and I
	anything like that?	l l	instructed the sergeant that it was the final
17	A. It's in my oath.		decision to close the center down so we could fix the
18	Q. And can you explain further?	l l	problems to prevent the mold. And the sergeant told
		l l	me that Ted said to reopen it because they don't want
19		l l	
	leaving a center open knowing that it has mold and	l l	to lose funding.
	getting people sick would not have been a good	21	When Ted came to the center he said the
	choice, a good decision.	l l	same thing to me, he said they have a lot to lose in
23	Q. Okay. So in your oath so it's your	l l	terms of funding and we can't just be closing centers
24	testimony that your oath as a police officer is what	24	down.

_			
1	Page 27 Q. Okay, and after that happened, did you	1	Page 29 and we were using their gym for the PAL center.
2	discuss the reopening of the center with Deputy	2	Q. Okay. To be clear, the City of
3	Commissioner Paterson?	3	Philadelphia did not own that building?
4	A. No. We were trying to figure Ted	4	A. No.
5	and I called the facilities team who came out, one of	5	Q. Okay. Were you disciplined for
6	the Board members scolded Ted Qualli in my presence	6	shutting the PAL center down?
7	and told him you need to be ashamed of yourself that	7	A. No.
8	this has been going on for three years and you didn't	8	Q. We talked a little bit already about
9	think it was important to address this. And we	9	funding for PAL, while you were the commanding
10	decided that we would try to find a solution to fix	10	officer of PAL did you have any complaints about the
11	the problems because we did need a center in that	11	funding?
12	community but not under those conditions.	12	A. Yes.
13	Q. You mentioned that you met with a	13	Q. And what were those complaints?
14	facilities team, who was on the facilities team?	14	A. We had a backlog of five years of
15	A. They're all Board members.	15	(Technical difficulties.)
16	Q. Okay. You had also testified that	16	MS. ULAK: Hold on. Your attorney just
17	there is a custodian named Fran at the Wissinoming	17	dropped off. We're going to hold on a second.
18	Center, did I understand that correctly?	18	THE WITNESS: Okay.
19	A. He is the he's the maintenance guy	19	MS. ULAK: We'll just go off the
20	at PAL.	20	record.
21	Q. Okay.	21	* * * *
22	A. I believe his name I forget his last	22	(Whereupon a discussion was held off
23	name, I'm sorry.	23	the record.)
24	Q. It's okay.	24	* * * *
	Page 28		Page 30
1		1	MS. ULAK: I stopped her. Ike, are you
	he's like the maintenance manager.	2	back with us?
3	-	3	MR. GREEN: Yes, I am now. Can you
	PAL?	4	back it up about five about three or four
5		5	questions I think I missed.
	Q. Frank, I'm sorry, Frank works for PAL?	6	MS. ULAK: Renee, do you mind repeating
7 8		7 8	the last question I asked.
	-	ΙI	THE COURT REPORTER: Off the record.
10	reopen? A. It never reopened while I was there.	10	THE VIDEOTAPE OPERATOR: The time is 10:49 a.m. and we're off the record.
		10	* * * * *
11		11	
12		12	(Whereupon, an off the record discussion was held.)
	the experts out, they found out there was a structural problem coming from the outside and that	13	discussion was neid.)
		14	
	that was fixed there was the problem was never	15	(Whereupon, the requested portion of
	that was fixed, there was the problem was never	16	the testimony was read back by the court
	going to go away. And because PAL did not own the	17	reporter.)
	building and the church is very limited on funds they	18	
	didn't have the money to fix it.	19	THE VIDEOTAPE OPERATOR: The time is
20		20	10:50 a.m., we are back on the record.
	that building?	21	MS. ULAK: Okay. I think, Renee, if
22		22	you don't mind, can you just repeat my last
	remember the names of the person who owns the	23	question and then Ms. Cintron you can you
	building, but a church was located in that building	24	start to answer it.

1	Page 31	1	Page 33 benefiting the kids and that we could redirect that
2	(Whereupon, the requested portion of	2	money to to, you know, to fix these facilities
3	the testimony was read back by the court	3	that the buildings could be in better conditions.
4	reporter.)	4	I also felt that they were spending a
5	* * * *	5	lot of money on repairing the headquarters. They
6	THE WITNESS: There was a few things I	6	spent over a million dollars to repair to renovate
7	was concerned about because we had a backlog	7	the PAL headquarters building, the new PAL
8	of going back five years of deplorable	8	headquarters building which was a building that
9	conditions at different PAL centers, and I		belonged to a PAL member who donated the building to
10	felt that they were spending money or putting		PAL on a temporary basis for headquarters to use.
11	money in the budget for things that were not	11	So I felt that they were spending all
12	conducive to get you know, they would take		this money for a building that eventually would go
13	from the budget to get things fixed to do		back to the PAL Board member as opposed to using that
14	other things that or support other programs	l I	money for actual programs or to actual to fix the
15	that were not in the benefit of getting things		centers so that the kids could be in safer
16	corrected at PAL in terms of like the	l I	conditions.
17	conditions at the centers.	17	Q. And you said you made complaints about
18	So I could give you a good example,		this to Ted?
19	there was there was a program that Nadirah	19	A. The building was already done, but
20	McCauley and Officer Little used to plan		there were still like another example I could give
21	they would spend thousands of dollars on		you
22	designer pocketbooks.	22	Q. No, Ms. Cintron, I'm sorry actually, I
	BY MS. ULAK:	23	want to back up. My question to you was you made
24	Q. Hang on, Ms. Cintron. I think you cut	24	these complaints to Ted
1	Page 32 out again. You had mentioned Officer Little and	1	Page 34 A. Yes.
		1 2	
	out again. You had mentioned Officer Little and	2	A. Yes.
2	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name?	2	A. Yes. Q did you make these complaints to
3 4	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes.	2	A. Yes. Q did you make these complaints to Ted?
2 3 4 5	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up	2 3 4 5	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members.
2 3 4 5	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy.	2 3 4 5	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints?
2 3 4 5 6	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they	2 3 4 5 6 7	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The
2 3 4 5 6 7 8	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending	2 3 4 5 6 7 8	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios,
2 3 4 5 6 7 8	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program	2 3 4 5 6 7 8	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who
2 3 4 5 6 7 8 9	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer	2 3 4 5 6 7 8 9	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he
2 3 4 5 6 7 8 9 10	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper	2 3 4 5 6 7 8 9 10	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this
2 3 4 5 6 7 8 9 10 11	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever	2 3 4 5 6 7 8 9 10 11	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I
2 3 4 5 6 7 8 9 10 11 12 13	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from.	2 3 4 5 6 7 8 9 10 11 12 13	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and
2 3 4 5 6 7 8 9 10 11 12 13	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I	2 3 4 5 6 7 8 9 10 11 12 13 14	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to
2 3 4 5 6 7 8 9 10 11 12 13 14	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo games. So I thought they were abusing that program	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this outlet. And my response was like why would Sunny Li
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo games. So I thought they were abusing that program because it was to their benefit, not to the kids'	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this outlet. And my response was like why would Sunny Li go there, Li is not an electrician, well, we needed
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo games. So I thought they were abusing that program because it was to their benefit, not to the kids' benefits benefit.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this outlet. And my response was like why would Sunny Li go there, Li is not an electrician, well, we needed another electrician. And when I instructed Frank to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo games. So I thought they were abusing that program because it was to their benefit, not to the kids' benefits benefit. Q. And, Ms. Cintron, did you did you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this outlet. And my response was like why would Sunny Li go there, Li is not an electrician, well, we needed another electrician. And when I instructed Frank to hire an electrician unbeknownst to me Ted cancelled
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo games. So I thought they were abusing that program because it was to their benefit, not to the kids' benefits benefit.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this outlet. And my response was like why would Sunny Li go there, Li is not an electrician, well, we needed another electrician. And when I instructed Frank to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	out again. You had mentioned Officer Little and Nadirah McCauley I think was her last name? A. Yes. Q. Can go just kind of go back and pick up from where from where you left off? I think your internet connection might be a little bit fuzzy. A. Okay. There was programs that they were spending money where they shouldn't be spending money. For instance, they were running a program where they buy hundred of dollars of designer pocketbooks and then they would also go buy cheaper pocketbooks at let's say, you know, like wherever they were buying them from. Then they would have pocket bingo I mean pocketbook bingo and they made sure that they walked away with the designer purses and the kids would win the cheaper purses at their little bingo games. So I thought they were abusing that program because it was to their benefit, not to the kids' benefits benefit. Q. And, Ms. Cintron, did you did you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q did you make these complaints to Ted? A. Yes, and the Board members. Q. And how would you make these complaints? A. I would talk to him about it. The issue would come out of the different scenarios, like, for instance, we there was an officer who had one of the electrical plugs sparking fire and he had to close down the homework room because of this electrical problem and I hired an electrician or I didn't hire the electrician, I spoke to Frank and told him hey, we need to hire an electrician to handle this and it took like five meetings for them to say that we weren't going to hire an electrician and they were going to send Sunny Li to inspect this outlet. And my response was like why would Sunny Li go there, Li is not an electrician, well, we needed another electrician. And when I instructed Frank to hire an electrician unbeknownst to me Ted cancelled

			1
1	Page 35 So it was the lack of concern and	1	Page 37 A. Deputy Commissioner Sullivan.
2	instead of prioritizing emergency over putting it	2	Q. And what complaints would you make to
3	into the building to me was like crazy that he would	3	Deputy Commissioner Sullivan?
4	choose to cancel this electrician to fix a problem	4	A. I when he became deputy Paterson
5	that could have caused a fire in that building, and	5	instructed me to go to his office and update him on
6	he redirected the maintenance staff to go paint a	6	everything that I had to spoke Paterson about. He
7	wall.	7	said I spoken to him, I gave him a rundown of
8	Q. Ms. Cintron, what building was it that	8	everything that went on at PAL and you need to go to
9	was having electrical problems?	9	speak to him, you know, that way he knows what's
10	A. It was I believe I can't recall	10	going on now that he's requested to take over PAL.
11	which building it was, but yeah, one of the	11	Q. And what did you tell Deputy
12	buildings, I think it was the building that Officer	12	Commissioner Sullivan?
13	Johnson was working in, whatever building he's	13	A. I sat down with him and I told him how
14	working in, that's the building that had the	14	there was a constant opposition and power struggle
15	electrical outlet problem.	15	from Ted Qualli not wanting to or not being open to
16	Q. I'm sorry, the building who was working	16	getting some of these problems resolved and while we
17	in, you cut out again?	17	needed things at the centers, he kept having parties,
18	A. Officer Johnson was the officer that	18	planning parties that weren't necessary instead of
19	brought that to our attention.	19	using those funds to make repairs and that's where we
20	Q. Officer Johnson, what was his first	20	had you know, I had concerns.
21	name?	21	Q. And I want to be clear, these concerns
22	A. I can't remember his first name.	22	were about the facilities and the state of the
23	Q. Okay.	23	facilities, correct?
24	A. It might be Daryl, Daryl Johnson.	24	A. The deplorable conditions of the
1	Page 36 Q. Okay, yeah, I'm not trying to get you		Page 38 facilities. They were also about programming because
2	to guess and I just know that Johnson is a common		they had a lot they would put a lot of money into
3	last name in the police department, so I thought I	3	like the golfing program. Some centers got more
	would try to narrow it down if we could.		funding than other centers and got preferential
5	So you would make complaints to Ted and		treatment in terms of getting whatever it is they
6	the Board and did you make complaints to anybody else	6	needed done right away.
7	about this?	7	Q. Can you explain a little bit more about
8	A. Yes. When Paterson was my deputy	8	the centers that got preferential treatment?
9	commissioner, I would give him updates about what was	9	A. Yes, Rizzo PAL, the building had
10	going on and he was aware that I was having concerns	10	problems I mean the roof had problems and even
11	for the safety and the maintenance at these buildings	11	though it was not within the budget, they were doing
12	and that a lot of my concerns were not taken serious	12	a special fundraising to put a brand new roof at
13	or ignored.	13	Rizzo PAL even though the roof guy told us that it
14	In this case with the electrical outlet	14	was nothing to be concerned about right away. That
15	I felt that Ted was using his, you know, like his	15	he could patch up the section that needed patching up
16	authority to show that he had the final say on what	16	and that that would at least another 10 years before
17	gets done and what doesn't get done.	17	they would have to put a new roof. But they decided
18	Q. To be clear, what was Ted's title?	18	that they would, you know, do a special fundraising
19	A. He was director of the Police Athletic	19	to put a new roof in at Rizzo PAL. And the fact that
20	League.	20	there was a five-year backlog of, you know, bad
21	Q. Aside from Deputy Commissioner	21	conditions in the centers I felt that that was not
22	Paterson, did you make any complaints to any other	22	responsible of them to do.
23	City of Philadelphia employees about your funding	23	They started renovating Rizzo PAL to do
24	concerns when it came to PAL centers?	24	a to do like a whole area for the equipment and

Г	Page 39		Page 41
1	things like that, so they were remodeling Rizzo PAL	1	
2	and what they said was that because the building	2	A. Yes.
3	belonged to PAL, they rather invest the money in that	3	Q. Okay. And did you make a complaint to
4	center than to fix stuff in other centers.	4	anybody about the fact that the wrestling program
5	Q. The centers that had, to borrow your	5	could travel but there couldn't be a travel
6	phrase, deplorable conditions, were those centers	6	basketball program?
7	that were owned by PAL or were those centers owned by	7	A. Yes, because of the officers had
8	other entities?	8	submitted several memos that wanted to do travel
9	A. I believe they were owned by other	9	basketball and they kept getting turned down prior to
10	entities, except for Cozen. I think the only ones we	10	me getting there and when I sat down with Ted Qualli
11	owned was Cozen PAL and Rizzo PAL.	11	to discuss it, his reasoning was that they were not
12	Q. You had mentioned preferential	12	allowed to leave the state, and as I was there longer
13	treatment in programming, can you talk a little bit	13	I found that there was that the wrestling team was
14	more about that?	14	allowed to leave the state just like the golfing team
15	A. Yes, for our Christmas parties we would	15	that's also ran out of Rizzo.
16	combine six to seven centers to have one big party,	16	Q. Did you make complaints about this to
17	that way we narrow down the amount of parties during	17	other anybody other than Ted Qualli?
18	the holiday season while involving, you know, all the	18	A. The Board, I told Sullivan, I told
19	centers. But with the exception of Rizzo PAL and	19	the the important people on the police side as
20	University of Penn PAL where they had their own	20	well as PAL side.
21	parties and got to invite like all the kids in their	21	Q. You say important people on the police
22	center, all the kids in the center as opposed to	22	side, who did you tell?
23	seven to 14 kids they would fit around to go to other	23	A. My commanding officer which was
24	centers to have combined parties. There was programs	24	Sullivan.
1	Page 40 in some centers such as Rizzo PAL that they didn't	1	Page 42 Q. And how did Sullivan respond when you
2	offer in other other centers.	2	made these complaints to him?
3	Q. Like what?	3	A. He didn't respond at all, he would
4	A. The wrestling program was one of them	4	dismiss me. He kept me he let them do whatever
5	and the wrestling program would be allowed to leave	5	they wanted to do. He didn't want me to do anything.
6	the state to do tournaments as well as being taken to	6	He kept undermining my command by always siding with
7	Disney World and they and this wrestling program	7	the Board.
8	was not per se a PAL program, it was ran by an	8	Q. You said he undermined your command, to
9	outside wrestling program in a PAL center and who	9	be fair he was your commanding officer, correct?
10	had their own coach.	10	A. Yes.
11	So basically they were facilitating the	11	Q. Okay. Were you ever disciplined for
12	outside program making it as falsely a PAL program	12	making these complaints?
13	and while the other officers wanted to have a	13	A. No.
14	basketball league that were able to do traveling	14	Q. Okay.
15	basketball, they were told that they couldn't have it	15	A. I was retaliated against.
16	because PAL programs and kids could not leave the	16	Q. Well, what do you mean by that?
17	Delaware Valley area. So what they allowed in one	17	A. I every time I complained Sullivan
18	center, they would not allow in other centers.	18	was isolating me. He would take he would call my
19	Q. But to be clear, you just testified the	19	sergeant who was my subordinate to his office and he
20	wrestling program was not a PAL program; did I	20	started planning and doing things through my
21	misunderstand you?	21	sergeant, Sergeant Faust, and whenever there was an
22	A. The PAL was being ran by a coach that	22	event or something that I was planning he would call
23	was not part of PAL and they were advertising it and	23	and tell me that other people would oversee those
24	getting funding for it as a PAL program.	24	events and those plans. And slowly but surely he was

$\overline{}$			
1	Page 43 cutting my responsibilities and isolating me more and	1	Page 45 that question, please.
2	more.	2	MS. ULAK: I asked what the
3	Q. Who were other who were the other	3	disciplinary action was.
4	people he would put in charge of those events?	4	MR. GREEN: Okay, thank you.
5	A. When I was planning the Eagles event,	5	THE WITNESS: The sergeant would
6	he assigned someone from police headquarters which	6	blatantly disobey my orders to carry out
7	was not part of PAL to handle an event that I had	7	anything and that's that's when I found
8	solidified with the Eagles team with the Eagles	8	that he was going to see Sullivan because the
9	team, and he told me that I would no longer oversee	9	sergeant had told me, and when I asked him why
10	that event and assigned someone from the third floor	10	was he at Sullivan's office he said well, he
11	to that event.	11	told me not to tell you that, you know, I was
12	Q. What was the Eagles event?	12	going to go see him and then that became an
13	A. The Eagles event was a Thanksgiving	13	every week situation where the sergeant would
14	dinners and Christmas dinners as well as toys that we	14	leave to go meet with Sullivan.
15	would give to the community. They would donate	15	And then because Sullivan told me not
16	everything, we would get together, put over a hundred	16	to take any actions against him he would
17	baskets together and we would go to the community and	17	basically started, you know, just being
18	give out these baskets and some of the Eagles players	18	blatantly disrespectful, blatantly disobeying
19	would go out with us to surprise those families.	19	my orders, making it harder for me to do my
20	Q. And who did he assign to oversee that	20	job, but the sergeant was being disciplined
21	event?	21	because he used to disappear and I would find
22	A. He just called me and said that I he	22	out that he'd be playing golf all day on City
23	first called me and told me to give him as	23	time with Board members.
24	explanation as to how I organized this event and once	24	He had been there for so long that this
1	Page 44 he knew the details he told me that I would no longer	1	Page 46 is what he was doing. The sergeant was also
2	be in charge, that he was going to assign someone	2	disgruntled because we used to get tickets
3	from the third floor.	3	donated to us by the different teams which
4	Q. You don't know who he assigned?	4	we're supposed to be distributed to the kids
5	A. No.	5	or the officers that work PAL, but these
6	Q. What year was that?	6	tickets would disappear, hundreds of tickets
7	A. 2017, 20 when he first got to PAL he	7	would disappear under the, you know, under the
8	started doing all of this. And basically he had me	8	sergeant's oversight.
9	taking orders from a subordinate sergeant because he	9	So I reassigned that task to someone
10	wouldn't speak to me. He would do everything through	10	else, Officer Younger to start overseeing and
11	my sergeant and instructed my sergeant to see him	11	making sure that the the gifts that we were
12	behind my back.	12	receiving were properly distributed and the
13	Q. And that was Sergeant Faust?	13	sergeant was upset about that.
14	A. Yes. This started causing a very	14	Just a lot of things that the sergeant
15	hostile work environment because he basically gave	15	was doing that was in violation of police
16	the sergeant wings to be disrespectful and to	16	department policy. One of them being paying
17	literally laugh at my face, you know, because the	17	the officers under the table for PAL events.
18	sergeant had been facing disciplinary action and	18	Along with Ted Qualli paying the
19	Sullivan told me that I was not to take any action	19	officers under the table for PAL-related
20	against the sergeant, so he was protecting the	20	events as opposed for the officers to get paid
21	sergeant.	21	their rightful salary and go through police
22	Q. What was the disciplinary action,	22	finance.
23	sorry?	23	BY MS. ULAK:
24	MR. GREEN: I'm sorry, can you repeat	24	Q. I'm sorry, Ms. Cintron, I may not have

Page 47 Page 49 understood you, were you saying that Sergeant Faust They never went through police finance. and Ted Qualli were both paying officers under the So a year later -- when Sullivan was in place, they table for PAL events? wanted to do then but they still hadn't gone through 3 finance and that was like another issue we were 4 Α. Yes. 5 Ο. How was Sergeant Faust paying people having. My job there was to make sure that people for PAL events under the table? were following policy and that the instructions I got He would coordinate for the officers to from Commissioner Ross was to straighten things out 8 show up at PAL events that were done during the over there because there was a lot of violation of weekend. Officers work Monday through Friday, not policies that he wanted me to correct, and my job was the weekends, so whenever they planned -- they had to make sure that they were following policy, but I 10 10 11 several events that they planned throughout the year 11 had no idea that this was going on until I got there. 12 for them to work on the weekend and instead of going 12 You say following policy, whose policy? 13 through police finance, they were paying the officers Departmental policy. 13 Α. 14 \$25 under the table to go work these events. Ο. Okay. And who has to follow 15 \$25 for the whole event, sorry? 15 departmental policy? 16 \$25 as opposed to their rightful 16 Α. The officers. salary, and I spoke to -- to Paterson about it as ο. Okav. 18 18 well as Sullivan about it and explained that they And the sergeants. 19 were going through finance, Sunny Li and Ted Qualli 19 Thank you. 20 told me that he had filed to go through finance but Do PAL employees have to follow 21 the finance never got back to them, and when I spoke departmental policy? 21 22 to someone in finance finance told me that they 2.2 They're not directly responsible to Α. didn't have any record of PAL trying to do, you know, follow departmental policy. But as I explained to 23 24 like do -- I forget what it's called, to get Ted and the Board, I cannot compel the officer to do Page Page 50 1 reimbursed, a reimbursement account and that they had something that's in violation of departmental policy. no record that PAL ever did that. And DC Paterson 2 2 I think you cut out again. Am I called me and told me the same thing and he was upset understanding correctly that you were saying you 4 because they hadn't reimbursed the City for some cannot compel an officer to do something in violation 5 money that they owed the City and then they were of departmental policy? paying them to do certain events instead of going 6 7 through finance, paying the officer like that. And just to be clear, PAL is not 8 So I stopped that and I said hey, we subject to police department policy? need to do this the correct way, we need to go No, they're civilian staff. through finance and establish an account, and the Okay. And civilian staff are not 10 10 Ο. 11 officers by contractual agreement are not allowed to 11 subject to departmental policy? 12 work in uniform on their days off because then it's No. The only thing they're responsible considered on duty, and they didn't understand that. 13 for and Ted and I spoke about it was to make sure 13 14 They were upset that I was changing the process of

16 concern and Paterson --17 Ο. Can you just back up, can you repeat 18 what you were saying? You cut out again. Paterson was really upset about how 19

how they pay these officers, so that was another

they were doing this and he said that from now on, unless it's going through police finance that he was going to allow the officers to work these events.

Did they start going through police

23

finance?

15

20

21

22

that whatever they were doing involving the officer was within the scope of our policies. So you testified that Commissioner Ross appointed you to be the commanding officer of PAL and that you wanted -- he wanted you to straighten things out. What did he mean by that? He just made the comment that the officers over there were doing -- were doing whatever 22 they wanted and that he needed me to go over there and make sure they were following policy and complying with, you know, departmental policy and

16

17

19

20

21

23

	5 [1		n 52
1	Page 51 contractual agreements and that's what I did.	1	have been patrol. To be honest with you, patrol
2	Q. You testified a few minutes ago about	2	bureau it's all confusing now.
3	concerns you had about Sergeant Faust, did you ever	3	Q. That's okay.
4	report him to Internal Affairs?	4	A. He definitely was not in charge of PAL,
5	A. I wrote him up several times. I gave	5	PAL wouldn't have fell under his jurisdiction.
6	him counseling forms and I discussed it with Paterson	6	Q. PAL would or would not have fallen
7	and Sullivan. Paterson would explain to him and	7	under his jurisdiction?
8	they called both sergeants to the office and told	8	A. Would not have fallen under his
9	them they better straighten out. Commissioner Ross	9	jurisdiction because I think he might have been
10	and Deputy Commissioner Paterson told them you guys	10	patrol. He was deputy commissioner of patrol
11	need to jump on board and stop acting like fools and,	11	operations.
12	you know, you all need to start complying, you know,	12	Q. Okay. What was Myron Paterson deputy
13	with the lieutenant. And I was about to write	13	commissioner of?
14	Sergeant Faust up when Sullivan took over but I was	14	A. He was deputy commissioner he was
15	instructed to leave him alone.	15	second in command, I can't remember what he was in
16	Q. And who you instructed you to leave him	16	charge of.
17	alone?	17	Q. When Joe Sullivan got promoted, did
18	A. Deputy Commissioner Sullivan.	18	Myron Paterson also get promoted?
19	Q. Okay. And did you just so we're	19	A. No.
20	clear, you never reported him to Internal Affairs,	20	Q. Myron Paterson stayed in the same
21	correct?	21	position?
22	A. No, I reported him to my commander and	22	A. Yes.
23	I went to Sullivan to seek his advice and he told me	23	Q. Did Joe Sullivan only work with PAL as
24	leave him alone, don't do nothing and leave him	24	deputy commissioner?
		-	
	Page 52		Page 54
	alone. By then the sergeant had been visiting	1	A. No.
2	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh	2	A. No. Q. Do you know what else Joe Sullivan
2	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me	1 2 3	A. No. Q. Do you know what else Joe Sullivan oversaw?
2 3 4	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear.	1 2 3 4	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol,
2 3 4 5	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL?	1 2 3 4 5	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts
2 3 4 5 6	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called	1 2 3 4 5	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol
2 3 4 5 6 7	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office	1 2 3 4 5 6	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations.
2 3 4 5 6 7 8	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan	1 2 3 4 5 6 7 8	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe
2 3 4 5 6 7 8	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he	1 2 3 4 5 6 7 8	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan?
2 3 4 5 6 7 8 9	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work	1 2 3 4 5 6 7 8 9 10	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year.
2 3 4 5 6 7 8 9 10	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that	1 2 3 4 5 6 7 8 9 10 11	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with
2 3 4 5 6 7 8 9 10 11	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the	1 2 3 4 5 6 7 8 9 10 11 12	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan?
2 3 4 5 6 7 8 9 10 11 12 13	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie	1 2 3 4 5 6 7 8 9 10 11 12 13	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working
2 3 4 5 6 7 8 9 10 11 12 13 14	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict	1 2 3 4 5 6 7 8 9 10 11 12 13 14	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to
2 3 4 5 6 7 8 9 10 11 12 13 14 15	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee PAL, then he can have it.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on one occasion he's rolling his eyes back, he's making
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee PAL, then he can have it. Q. When Deputy Commissioner when Joe	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on one occasion he's rolling his eyes back, he's making all these like bothering gestures as opposed to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee PAL, then he can have it. Q. When Deputy Commissioner when Joe Sullivan was promoted to deputy commissioner, what	1 2 3 4 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on one occasion he's rolling his eyes back, he's making all these like bothering gestures as opposed to having some concern about the concerns I was bringing
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee PAL, then he can have it. Q. When Deputy Commissioner when Joe Sullivan was promoted to deputy commissioner, what did he become the deputy commissioner of, do you	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on one occasion he's rolling his eyes back, he's making all these like bothering gestures as opposed to having some concern about the concerns I was bringing to him.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee PAL, then he can have it. Q. When Deputy Commissioner when Joe Sullivan was promoted to deputy commissioner, what did he become the deputy commissioner of, do you remember?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on one occasion he's rolling his eyes back, he's making all these like bothering gestures as opposed to having some concern about the concerns I was bringing to him. And he started telling me let them do
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	alone. By then the sergeant had been visiting Sullivan every week and would come back and laugh about it and say oh, he's my buddy now loudly for me to hear. Q. When did Joe Sullivan take over PAL? A. When he got promoted I was called through Deputy Commissioner Paterson to his office and he informed me that Deputy Commissioner Sullivan wanted to have oversight over PAL, and he expressed which is fine by me because it's less work for me if he wants to do my job and take over that unit. And I immediately told Paterson given the conversations I had with Robert Rabena and Bernie Prazencia about Sullivan, that it would be a conflict of interest for Sullivan to oversee PAL and Paterson reiterated, let's just see what happens. It's a load off me and if he wants to overtake PAL oversee PAL, then he can have it. Q. When Deputy Commissioner when Joe Sullivan was promoted to deputy commissioner, what did he become the deputy commissioner of, do you	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No. Q. Do you know what else Joe Sullivan oversaw? A. He was deputy commissioner of patrol, so he would have been in charge of all the districts and, you know, anything pertaining to patrol operations. Q. For how long did you work for Joe Sullivan? A. I would say about a year. Q. How was your working relationship with Joe Sullivan? A. We did not have a good working relationship because immediately when he began to oversee PAL he was meeting with the Board, and every time I would go talk to him he would literally be so dismissive about anything that I had to say that on one occasion he's rolling his eyes back, he's making all these like bothering gestures as opposed to having some concern about the concerns I was bringing to him.

20 lot of jumping around here.

Okay. You had testified that the

22 impetus for the MOU was that there was going to be

23 this policy that PAL had proposed, that they wanted

you to sign off on and it would give them complete

20

21

23

equation.

So he ordered that Memorandum of

22 Understanding. It was being processed. It took a

Solicitor, I believe the person prior to you and --

long time. They were working with the City

Г	Page 59		Page 61
1	oversight of PAL and it was not conducive to the	1	Q. Okay.
2	police department. Did I get that correct?	2	A. But if Ted and I are supposed to be in
3	A. Right, because the way that it was	3	charge of PAL, my question is why do I have to go to
4	structured, all the decisions, the final decisions	4	one of his subordinate staff to get permission only
5	would line with Ted Qualli.	5	for Ted to have final authority anyway?
6	Q. And what decisions were those; what	6	Q. Okay.
7	types of decisions?	7	A. It should have been my decision and his
8	A. According to the policy it would have	8	decision as final authority.
9	been everything because every department would have	9	Q. Okay. And this is for things like
10	gone for his final say.	10	programming?
11	Q. Well, and I know that I understand	11	A. Everything PAL according to what they
12	what you're saying but I need you to be specific, you	12	told us we were supposed to be doing.
13	say everything, is that funding?	13	Q. Okay. Again, I ask for things like
14	A. It was everything, programs.	14	programming, right?
15	Everything that we did at PAL would have been	15	A. Yes.
16	filtered through his staff ultimately him being the	16	Q. Is that for things like how where to
17	final decision maker. So in essence as the	17	allocate a budget?
18	commanding officer I had people subordinate staff to	18	A. We yes. Like budget, everything,
19	me that I would have to go to to get permission to do	19	everything PAL.
20	stuff.	20	Q. Is that for things like how to
21	Q. Okay.	21	Ms. Cintron, I'm asking a question.
22	A. Ted, at his level, could make the final	22	Is that for things like approving
23	decisions. So even if I requested anything it would	23	capital improvements to a building?
24	have gone to Ted for final decisions.	24	A. It had to do with everything pertaining
\vdash		_	
1	Page 60 Q. You say a subordinate staff, do you	1	Page 62 to PAL, the finances, programming, what we're going
	Q. You say a subordinate staff, do you	2	to PAL, the finances, programming, what we're going
2	Q. You say a subordinate staff, do you mean PAL civilian staff?	2	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do,
2 3 4	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff	2 3 4	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them.
2 3 4	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that	2 3 4 5	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or
2 3 4 5 6	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes.	2 3 4 5 6	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed
2 3 4 5 6	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian	2 3 4 5 6	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job
2 3 4 5 6 7	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia?	2 3 4 5 6 7 8	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer?
2 3 4 5 6 7 8	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No.	2 3 4 5 6 7 8	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that
2 3 4 5 6 7 8	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers,	2 3 4 5 6 7 8	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It
2 3 4 5 6 7 8 9	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct?	2 3 4 5 6 7 8 9	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what.
2 3 4 5 6 7 8 9 10	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No.	2 3 4 5 6 7 8 9 10 11	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay.
2 3 4 5 6 7 8 9 10 11 12 13	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so	2 3 4 5 6 7 8 9 10 11 12 13	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting
2 3 4 5 6 7 8 9 10 11 12 13	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm	2 3 4 5 6 7 8 9 10 11 12 13 14	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the	2 3 4 5 6 7 8 9 10 11 12 13 14 15	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get authority from someone to do something that I'm	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross made very clear at the meeting and it was supposed to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get authority from someone to do something that I'm trying to do who's reporting to me on that team even	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross made very clear at the meeting and it was supposed to be implemented in the Memorandum of Understanding.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get authority from someone to do something that I'm trying to do who's reporting to me on that team even though they're civilians they're working with me on	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross made very clear at the meeting and it was supposed to be implemented in the Memorandum of Understanding. They did not want the Memorandum of Understanding to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get authority from someone to do something that I'm trying to do who's reporting to me on that team even though they're civilians they're working with me on that programs team. Q. Okay. The programs team you testified though, they're not City of Philadelphia employees,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross made very clear at the meeting and it was supposed to be implemented in the Memorandum of Understanding. They did not want the Memorandum of Understanding to take place and they were really upset about it. Q. You said Commissioner Ross at the meeting, what meeting?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get authority from someone to do something that I'm trying to do who's reporting to me on that team even though they're civilians they're working with me on that programs team. Q. Okay. The programs team you testified	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross made very clear at the meeting and it was supposed to be implemented in the Memorandum of Understanding. They did not want the Memorandum of Understanding to take place and they were really upset about it. Q. You said Commissioner Ross at the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. You say a subordinate staff, do you mean PAL civilian staff? A. It would have been PAL civilian staff who have a lesser authority within the structure that I do, yes. Q. Okay. But to be clear, PAL civilian staff are not employed by the City of Philadelphia? A. No. Q. And they're not police officers, correct? A. No. Q. But so A. What I'm trying to explain is that, I'm in charge for instance, if I'm charge of the programs team, why would I go downward to get authority from someone to do something that I'm trying to do who's reporting to me on that team even though they're civilians they're working with me on that programs team. Q. Okay. The programs team you testified though, they're not City of Philadelphia employees,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	to PAL, the finances, programming, what we're going to do this year, what fundraisers we're going to do, how we're going to do them. Q. Is there any documentation or literature that you received when you were appointed commanding officer of PAL that laid out your job description and duties as commanding officer? A. No, but when they try to implement that policy, that's what the MOU was supposed to do. It was supposed to outline who had authority over what. Q. Okay. A. And it was discussed at the meeting that Ted and I had equal authority, not him more than me because he worked for the Board. We had equal authority over all things PAL which Commissioner Ross made very clear at the meeting and it was supposed to be implemented in the Memorandum of Understanding. They did not want the Memorandum of Understanding to take place and they were really upset about it. Q. You said Commissioner Ross at the meeting, what meeting?

1	Page 63 implement.		Page 65 correct to you?
2	Q. When did that meeting take place?	2	A. No.
3	A. 2017.	3	Q. So what had happened in this incident,
4	Q. And where did it take place?	4	do you recall?
5	A. Commissioner Ross' office.	5	A. I was in my office and I heard yelling
6	Q. And were Ted Qualli, Ron Rabena and	6	between Chase Trimmer and Officer Klayman and when
7	Bernie Prazencia all physically present at that	7	I we came out of the office, they were arguing and
8	meeting?	8	I instructed both of them to stop, which they did and
9	A. Yes.	9	basically they were arguing over the use of a
10	Q. You testified about an issue at PAL	10	computer.
11	between civilian staff and a police officer, what was	11	Q. You said we, were you with somebody?
12	the issue?	12	A. Yes, I was in a meeting I was in a
13	A. They began fighting over the use of a	13	meeting with Sergeant Faust and Cassandra Harris
14	computer a computer.	14	about an upcoming event.
15	(Technical difficulties.)	15	Q. You testified you were a meeting with
16	BY MS. ULAK:	16	Sergeant Faust was that?
17	Q. I'm sorry, you have to repeat that.	17	A. Yes. Sergeant Faust was in the office
18	A. They were arguing about the use of a	18	and Cassandra Harris was in my office and we were
19	computer.	19	talking about an upcoming event. She was filling
20	Q. Who is the police officer?	20	Cassandra Harris was filling us in about an event
21	A. Officer Klayman and Chase Trimmer.	21	that was taking place.
22	Q. When did that happen?	22	Q. You heard yelling and you went to see
23	A. Also 2018.	23	what was happening?
24	MS. ULAK: At this point I like to	24	A. Yeah, I came out of the office to find
_	Page 64		Page 6
1	request a five-minute comfort break if that's	1	out what was going on.
2	possible.	2	
3	MR. GREEN: I'm sorry.	3	A. They argued. I told them be quiet,
4	MS. ULAK: I would like to request a		they did, stop arguing. And they had like a few
5	five-minute comfort break.		final words and then I called I told the sergeant
6	MR. GREEN: Oh, sure.		to deal with the officer and pull him in to my
7	MS. ULAK: I think our court		office. I called Ted Qualli to discuss the situation
8	reporter would like one.	8	with him because it was involving one of his staff, a
9	MR. GREEN: Oh, absolutely.		person that reported to him, and Ted Qualli was not
10	THE VIDEOTAPE OPERATOR: The time is	10	answering my phone calls.
11	11:39 a.m. We are off the record.	11	And the next thing you know I'm getting
12	* * * *	12	a call from the deputy because the Ted Qualli spoke
13	(Whereupon, a brief recess was taken.)	13	to him directly without discussing anything with me
14	* * * *	14	and he ends up calling a meeting with his staff
15	THE VIDEOTAPE OPERATOR: The time is	15	telling them to go home because Officer Klayman
16	11:54 a.m. and we are back on the record.	16	carries a gun and he basically prompted I wouldn't
17	BY MS. ULAK:	17	say hysteria, but like people that were not even
18	Q. Okay. Ms. Cintron, before we took a	18	there or were aware of the incident were they were
19	break you had mentioned excuse me, I'm sorry.	19	all sent home.
20	Before we took a break you had mentioned an issue	20	Q. Okay. Did that all happen on the day
21	that occurred between a police officer and a power	21	of this incident?
22	play over the use of a computer and you had testified	22	A. Yes.
23	that it had happened in 2018. If I submitted to you	23	Q. Who is David Klayman?
24	that this may have happened in 2017, would that seem	24	A. He used to be my assistant.

1	Page 67 Q. Okay. And for whom did he work?	1	Page 69 organized events, he was on the programs team
2	A. He was a police officer.	2	and things of that nature. He handled all the
3	Q. And what was your relationship with	3	paperwork that I had to turn in to the City,
4	him?	4	like if we had any memos to do, if we had any
5	A. He worked for me. He was my assistant.	5	anything like that to do, overtime. He
6	Q. What did he do for you as your	6	managed overtime, making sure that it was on a
7	assistant?	7	rotating basis.
8	A. He would get crime data for me, run	8	BY MS. ULAK:
9	errands for PAL, coordinate events if the	9	Q. You say he managed overtime making sure
10	(Technical difficulties.)	10	it was on a rotating basis, was he the one that would
	BY MS. ULAK:		assign overtime to the officers?
12	Q. Hang on. Hang on. Hang on.	12	A. No.
13	Can you repeat that?	13	Q. Okay.
14	A. The whole thing?	14	A. The sergeant would do that, but when I
15	MS. ULAK: Let's go off the record for		got there it was not equally distributed, so his job
16	a second.		was to check the reports to make sure that we were on
17	THE VIDEOTAPE OPERATOR: The time is		a rotating basis and that everyone got equal amount
18	11:58 a.m. We are off the record.		of overtime.
19	* * * * *	19	Q. Okay. When did he join PAL?
20	(Whereupon a discussion was held off	20	A. A few months after I arrived.
21	the video record only.)	21	Q. Was somebody that he brought on or was
22	* * * * *		he brought into PAL by somebody else?
	MS. ULAK: Ms. Cintron, you're having	23	A. I spoke to Paterson told me I could
23			
24	significant hearing issues. Is everybody else	-	have an assistant and he told me to pick someone and
1	Page 68 having issues with this?		Page 70 because he was worked at the 25th District and did a
2	MR. GOLDEN: I don't see the witness	2	great job there I picked him as second choice because
3	right now. She's frozen.	3	my first choice couldn't come.
4	MR. GREEN: Maybe if she dials in, that	4	Q. Who was your first choice?
5	might improve the overall signal from her end.	5	A. Mulholland, Officer Jimmy Mulholland
6	MS. ULAK: That might be a better	6	(ph.)
7	option.	7	Q. And why couldn't he come?
8	* * * *	8	A. Because his wife was a nurse at
9	(Whereupon, a brief recess was taken.)	9	St. Christopher's Hospital, which is in close
10	* * * *	10	proximity to the 25th District, they had the same
11	THE VIDEOTAPE OPERATOR: The time is	11	hours and they would travel to work together and
12	12:07 p.m. and we are back on the record.	12	leave together, so when he found out that PAL worked
13	MS. ULAK: Ms. Schumann, do you mind	13	evening hours or afternoon hours, he told me he
14	rereading my last question?	14	couldn't do it. He couldn't change his shift.
15	* * * *	15	Q. Okay. And when Officer Klayman joined
16	(Whereupon, the requested portion of	16	that was when you were able to ensure that overtime
17	the testimony was read back by the court	17	was being distributed on a rotating basis?
18	reporter.)	18	A. Yeah, I would give him assignments.
19	* * * *	19	Since we have so many events and so many programs
20	THE WITNESS: He was the administrative	20	going on and I had to visit centers and all of that,
21	assistant. He primarily worked on the mapping	21	he would monitor that stuff for me like an
22	analysis, crime data, getting he ran some	22	administrative assistant would.
23	PAL-related, you know, runs, picked stuff up,	23	Q. Okay. What hours did he work for PAL?
24	he organized some of the helped some of the	24	A. It depends. PAL his hours were in

_			
1	$$\operatorname{\textsc{Page}}\xspace$ 71 the morning like eight to five or nine to five,	1	Page 73 transfer list to see if this individual was on the
2	whatever it was, and but if I had to switch to	2	list. He was not on the list, so I told him have him
3	night work because we had events that he was	3	submit his paperwork and when I looked into this
4	assisting with, he would work in the afternoons as	4	individual he had less than two years on the job. He
5	well. So it just depends like what was going on at		did not have the points necessary to transfer and he
	PAL.		did not have the experience nor was he doing anything
7	Q. Okay. Was he able to work flexible		in the community to indicate that he was
	hours?		community-oriented which is required being at PAL.
9	A. No, he wasn't able to work flexible	9	Q. Ms. Cintron, I'm sorry to interrupt you
	hours. He went by the schedule, primarily my		but I just want to ask this question, what is this
	schedule which was all kinds of different times		individual's name?
	because he was my assistant.	12	A. It's in the paperwork that we submitted
13	-		
			for discovery, but I can't recall his name right now
	worked?		to be honest with you.
15	A. Yes. And sometimes when I worked the	15	Q. Okay. All right.
	afternoon, he will work the morning because he had	16	A. I know he was in the 17th I know he
	stuff to do in the morning. So it just depends on		was in the 17th District.
	what was going on in the unit.	18	Q. All right. Continue.
19	Q. Okay. After the incident with the	19	A. So I explained to Ron Rabena that it
	civilian, did he continue working at PAL?	20	would be hard for me to transfer him in and it would
21	A. No, Sullivan had him transferred.	21	be unfair for me to transfer him in given that he did
22	Q. Where was he transferred to?	22	not meet the criteria for transfer. Even though I
23	A. Neighborhood services.	23	told him that he would still ask me every time I saw
24	Q. Okay. Did Sullivan request that you	24	him, come on lieutenant, do me that favor, have him
1	Page 72 transfer him out?		Page 74 transferred in and what have you, and I told him I
1 2		1	
	transfer him out?	2	transferred in and what have you, and I told him I
2	transfer him out? A. No, he just did it.	2 3	transferred in and what have you, and I told him I don't have the authority to transfer someone in
2	transfer him out? A. No, he just did it. Q. Okay. To your knowledge, was he ever	1 2 3 4	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the
2 3 4 5	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or	1 2 3 4 5	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that.
2 3 4 5	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not.	1 2 3 4	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from
2 3 4 5 6 7	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work	1 2 3 4 5 6 7	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I
2 3 4 5 6 7 8	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department?	1 2 3 4 5 6 7 8	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the
2 3 4 5 6 7 8	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from	1 2 3 4 5 6 7 8	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron
2 3 4 5 6 7 8 9	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter.	1 2 3 4 5 6 7 8 9 10	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this
2 3 4 5 6 7 8 9 10	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about	1 2 3 4 5 6 7 8 9 10 11	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and
2 3 4 5 6 7 8 9 10 11	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into	1 2 3 4 5 6 7 8 9 10 11 12	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the
2 3 4 5 6 7 8 9 10 11 12 13	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL.	1 2 3 4 5 6 7 8 9 10 11 12 13	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena.
2 3 4 5 6 7 8 9 10 11 12 13	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he was asking me to do him a favor and have an	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that this officer was working there.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he was asking me to do him a favor and have an individual transferred into PAL. First he said it	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that this officer was working there. So I spoke to the officer and I said
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he was asking me to do him a favor and have an individual transferred into PAL. First he said it was a relative, then he said it was a family friend,	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that this officer was working there. So I spoke to the officer and I said no, he was basically asking me did I approve for this
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he was asking me to do him a favor and have an individual transferred into PAL. First he said it was a relative, then he said it was a family friend, so I don't know exactly what's the relationship there	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that this officer was working there. So I spoke to the officer and I said no, he was basically asking me did I approve for this to happen and I said no, I had no idea that she was
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he was asking me to do him a favor and have an individual transferred into PAL. First he said it was a relative, then he said it was a family friend,	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that this officer was working there. So I spoke to the officer and I said no, he was basically asking me did I approve for this
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No, he just did it. Q. Okay. To your knowledge, was he ever disciplined for the incident with the civilian? A. I'm not sure if he was disciplined or not. Q. To your knowledge, does he still work for the police department? A. To my knowledge, he graduated from college and he left the job shortly thereafter. Q. Earlier you had testified about somebody having a desire to bring an officer into PAL. A. Yes. Q. And I wanted to know if you could elaborate on that again. A. From the moment I met Ron Rabena, he was asking me to do him a favor and have an individual transferred into PAL. First he said it was a relative, then he said it was a family friend, so I don't know exactly what's the relationship there	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	transferred in and what have you, and I told him I don't have the authority to transfer someone in without properly without showing that they met the criteria and that it was beyond you know, above my level to do something like that. At what which time I got a call from Captain Francis which is which was at the time, I don't know if she's still there, the captain of the 17th District and she said she mentioned Ron Rabena, that Ron Rabena had called her, that this officer worked for her and that he was a good kid and she was recommending him, and I explained to her the same thing I explained to Ron Rabena. The next thing I know my officer from the 17th District PAL called me and asked me why was this kid working at the center assigned to the center by Captain Francis which I didn't know that this officer was working there. So I spoke to the officer and I said no, he was basically asking me did I approve for this to happen and I said no, I had no idea that she was

_			
1	Page 75 background check and that this officer would not fall	1	Page 77 transfer this individual if he wanted to, so
2	under any PAL protection or because they're	2	that's what you're going to have to do because
3	working there and they're not supposed to even be	3	I don't have the authority to do that. And he
4	there, and I told her that she needed to reassign her	4	called I think later on when I saw
5	officer back back to her district. Basically she	5	Commissioner Ross at an event he mentioned
6	was carrying the officer as being at work, but in	6	that Lieutenant Clark had called him, but he's
7	reality she was sending him to work at the PAL center	7	like I don't want to hear that nonsense, you
	every day.	8	know, if he don't qualify to go over there
9	Q. You say Captain Francis, what's Captain	9	he's not going.
10	Francis' first name?	10	And when Sullivan later on I spoke
11	A. I don't know her first name. I know	11	to Sullivan about it and Sullivan didn't say
	her as Captain Francis.	12	nothing when me and him spoke about it until
13	Q. Okay. And to be clear, you don't	13	we went to a meeting and we were supposed to
	recall the name of the individual even though that	14	discuss the MOU and that I mentioned earlier,
	person was being placed in PAL centers to work,	15	the same meeting that I mentioned earlier and
	correct?	16	at that time he told Ron Rabena in my presence
17	A. Yeah, I can't recall now, you know,	17	about that transfer, that kid you want, we
	it's been a while.	18	need new kids in the unit. He said consider
19	Q. Okay.	19	it done.
20	(REQUEST)	20	And that's when he was becoming really
21	MS. ULAK: I'm just going to make a	21	disrespectful and, you know, doing all these
22		ΙI	
	request on the record that somebody provide me	22	gestures with his hand as to disregard what I
23	with the name of that individual. I don't see	23	had to say. BY MS. ULAK:
24	it in my file, but I know that this matter had	24	
1	Page 76 been transferred to me, so, you know, it's	1	Page 78 Q. Okay. I want to unpack this a little
2	very possible it was sent earlier and I just	2	bit more.
3	don't have it. So I would just kind of	3	Before Joe Sullivan became deputy
4	request that Ike's office resend it to me,	4	commissioner and took over PAL, were you getting
5	okay?	5	pressure to bring this individual, whose name you
6	MR. GREEN: I don't have it I mean I	6	can't remember, into PAL?
7	don't have it.	7	A. Yes.
8	MS. ULAK: Okay then. All right.	8	Q. Okay. Did that start pretty early into
9	THE WITNESS: So after I spoke to	9	your tenure as commanding officer at PAL?
10	Captain Francis, I get a call from Council	10	A. Yes. However, Sullivan had once he
11	President Daryl Clark who also mentioned Ron	11	came in he informed the PAL the PAL, I mean,
12	Rabena, that Ron Rabena had given him a call	12	Bernie Prazencia and Ron Rabena that he would make it
13	and asked him to call me about this	13	happen. He abused his authority and said he would
14	individual, and I explained to him the same	14	make it happen regardless of the decision I had made.
15	thing that I explained to Rabena, as well as	15	Q. Okay. And just to be clear there was
16	Captain Francis and he said to me you need to	16	no question pending, but what I'm going to ask you
17	transfer this kid or I'm going to start making	17	now is, for approximately two years while you were
18	some calls about you starting with	18	commanding officer of PAL, you reported to Deputy
19	Commissioner Ross and he was pretty much	19	Commissioner Paterson; is that correct?
20	the way I took it was a threat that I was	20	A. Yes.
21	going to be blackballed, you know, or whatever	21	Q. Okay. And it was during this time that
22	if I didn't do this favor.	ΙI	you were getting pressure to move this individual
23	And at that point I told him, well,	ΙI	into PAL?
24	Commissioner Ross would be in the position to	24	A. During the time it started with

Г	Page 79		Page 81
1	Paterson. I can't pinpoint the date, but it started	1	A. Yes.
2	when I was working when Paterson oversaw PAL. I	2	Q. And so that would have been over a year
3	wouldn't say it was two years, like I can't pinpoint	3	after Joe Sullivan took over as the deputy
4	the date, but it started when I reported to Paterson.	4	commissioner overseeing PAL, am I understanding that
5	Q. Okay. And then when Sullivan took	5	correctly?
6	over	6	A. The meeting took place as soon as he
7	A. And I don't mean to cut you off, but	7	went to PAL.
8	when I explained to Paterson what was going on, he	8	Q. Okay. So
9	said if he doesn't qualify to come to PAL then	9	A. I don't know I can't speak for when
10	they they better not call me about it, you know.	10	the kid was transferred because I don't know the
11	Q. Yes. And if I'm understanding your	11	date.
12	previously testimony correctly after you Council	12	Q. Well, I'm not asking you for the date.
13	President Clark called you, Commissioner Ross also	13	I'm asking you if it would have been over a year
14	agreed with the fact that he did not qualify and to	14	between that first meeting taking place and when this
15	not be transferred in; is that correct?	15	individual was transferred into PAL?
16	A. They didn't agree well, I won't	16	A. That's what I'm saying, I was out for
17	say what I'm trying to explain is that he didn't	17	almost a year, so I don't know where in that process
18	qualify which is why I couldn't make put in	18	did he transfer in. It could have been a year, it
19	paperwork to have him transferred in because it would	19	could have been six months after I went on leave, I
20	have been declined from the upper ranks. When I	20	don't know.
21	spoke to Paterson who informed Ross, they told me	21	Q. Did you go on leave a year after Joe
22	that if the kid didn't qualify then not to worry	22	Sullivan took over PAL?
23	about it because I wasn't doing anything wrong.	23	A. Maybe approximately, yeah.
24	It wasn't until Sullivan got into	24	Q. So, again, would you agree with me that
1	Page 80 office became oversight over PAL that he said	1	Page 82
	basically it doesn't matter what the lieutenant has	l l	it had to have been at least a year between that first meeting in which you testified that Joe
		l l	Sullivan said that this individual would be
	to say, we need new people at PAL and don't worry	l l	transferred into PAL and when that individual was
5	about it, consider it done. He told Ron Rabena. O. And did that individual get moved into	l l	actually transferred into PAL, it would have been at
	Q. And did that individual get moved into PAL?	l l	-
0	The second secon	0 7	least a year, right?
'	A. From my understanding, yes, aiter		MR. GREEN: Objection. She's trying to
	enough or when I went out on leave.	8	avoid guessing.
9	Q. Okay. So that was over a year later;	9	MS. ULAK: I would prefer I would
	is that right?	10	prefer you not offer a speaking objection.
11	A. I don't know the dates, so I don't know	11	You can answer the question.
	the date that he got transferred in.	12	MR. GREEN: If you know.
13	Q. Okay. Let me ask it this way, you	13	THE WITNESS: I don't know when he got
	worked for Joe Sullivan for approximately a year,	14	transferred in, so I would say maybe a year,
	right?	15	yes, I don't know.
16			BY MS. ULAK:
17	Q. Yes?	17	Q. Okay, fine. After that first meeting
18	A. Yes.	l l	where Joe Sullivan said that that individual would
19	Q. And after you went out on leave, this	l l	get transferred into PAL, did you ever discuss it
	individual transferred into PAL, right?	l l	with Joe Sullivan?
21	A. Some time between the time that I went	21	A. I had discussed it previous previous
22	on leave and had to leave the job, yes.	l l	to that meeting with him so he knew why I couldn't
	Q. Is that between when you went out on	123	put the paperwork in to have him transferred.
23	Q. Is that between when you went out on	23	F *** **** F **F *** *** *** *** *** **

1	Page 83 again?	1	Page 85 A. Or I would leave it in the office to
2	A. No, because he made it very clear that	2	avoid carrying two phones.
3	that was his decision.	3	Q. For how long was your City issued phone
4	Q. Okay. In your discussion with him	4	not working?
5	before the meeting when you said this is why I can't	5	A. It would get like like freeze up on
6	transfer him in, did he have anything to say in	6	me, so sometimes it would work, sometimes it wouldn't
7	response to that?	7	work which is why I took it the first time to get
8	A. No.	8	fixed, then they gave it back to me and it was still
9	Q. Were you disciplined at all for not	9	doing the same thing so I took it back to get it
10	transferring this individual in?	10	replaced.
11	A. No.	11	Q. I'm going to pull up a document, just
12	Q. While you were the commanding officer	12	give me a one second here.
13	of PAL, did you have a City issued cell phone?	13	We'll mark this as City-1. Hang on a
14	A. Yes.	14	second.
15	Q. Were there ever any issues with your	15	What is happening here? I'm sorry, I
16	connectivity with the City issued cell phone?	16	apologize.
17	A. Yes.	17	All right. Ms. Cintron, are you able
18	Q. Can you tell us a little bit about	18	to see my screen?
19	those issues?	19	A. Uh-huh.
20	A. The phone would not work and I had a	20	Q. Yes?
21	switch it twice. Like there was an issue with the	21	A. Yes.
22	line, I don't know what was going on, but I had to	22	Q. Great. So we're going to mark this
23	turn in the phone because it was not working	23	document as City-1, I will submit to you that this
24	properly.	24	document is four pages, it is Bates marked Sullivan
1	Page 84 I took it once before Sullivan to get	1	Page 86 239 through Sullivan 242.
	fixed, they gave it back to me and when Sullivan took	2	I just want to pull your attention to
	over it was still not working properly so I had to	ΙI	the first page in this document marked Sullivan 239,
	get a new one.	ΙI	and I'm just going to give you a minute to read this
5	Q. Okay. Did you have any issues getting	5	e-mail.
6	24 1 10		
	it replaced?	6	A. Okay. (Witness complies.)
7		6 7	
	-	7	A. Okay. (Witness complies.) Q. And you can tell me you're done reading it.
	A. No, once I took it the second time they	7	Q. And you can tell me you're done reading
8	A. No, once I took it the second time they replaced it.	7	Q. And you can tell me you're done reading it.
8 9 10	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't	7 8 9	Q. And you can tell me you're done reading it. A. Okay.
8 9 10	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach	7 8 9 10	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail
8 9 10 11	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you?	7 8 9 10	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe
8 9 10 11 12	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that?	7 8 9 10 11	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you?
8 9 10 11 12 13	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I	7 8 9 10 11 12 13	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes.
8 9 10 11 12 13	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well.	7 8 9 10 11 12 13 14	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the
8 9 10 11 12 13 14 15	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK:	7 8 9 10 11 12 13 14 15	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your
8 9 10 11 12 13 14 15 16	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK: Q. If your City issued cell phone was not	7 8 9 10 11 12 13 14 15	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your City phone has been inoperable for some time and you
8 9 10 11 12 13 14 15 16 17	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK: Q. If your City issued cell phone was not working, was there another way for people to reach	7 8 9 10 11 12 13 14 15 16	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your City phone has been inoperable for some time and you used your private phone while working.
8 9 10 11 12 13 14 15 16 17	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK: Q. If your City issued cell phone was not working, was there another way for people to reach you?	7 8 9 10 11 12 13 14 15 16 17	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your City phone has been inoperable for some time and you used your private phone while working. Did I read that correctly?
8 9 10 11 12 13 14 15 16 17 18	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK: Q. If your City issued cell phone was not working, was there another way for people to reach you? A. No.	7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your City phone has been inoperable for some time and you used your private phone while working. Did I read that correctly? A. Yes.
8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK: Q. If your City issued cell phone was not working, was there another way for people to reach you? A. No. Q. Did you have a personal cell phone?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your City phone has been inoperable for some time and you used your private phone while working. Did I read that correctly? A. Yes. Q. Okay. So would you use your private
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No, once I took it the second time they replaced it. Q. If your City issued phone wasn't working, how were people going to be able to reach you? MR. GREEN: Can you repeat that? MS. ULAK: I'm sorry, I don't think I asked very well. BY MS. ULAK: Q. If your City issued cell phone was not working, was there another way for people to reach you? A. No. Q. Did you have a personal cell phone? A. I have a personal cell phone but I	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. And you can tell me you're done reading it. A. Okay. Q. Okay. So having looked at this e-mail would you agree that this is an e-mail from Joe Sullivan to you? A. Yes. Q. And looking at this e-mail in the second paragraph it states you responded that your City phone has been inoperable for some time and you used your private phone while working. Did I read that correctly? A. Yes. Q. Okay. So would you use your private cell phone while you were working if your City phone

T	Page 87	Г	Page 89
1	make police-related phone calls.	1	the to the last deposition.
2	Q. Okay.	2	BY MS. ULAK:
3	A. But I never knew when the phone was	3	Q. And prior to going to your last
4	going to freeze up on me so sometimes I didn't have	4	deposition, had you ever seen this letter before?
5	it on me because I usually keep it in the office.	5	A. Yes, they showed it to me at Internal
6	Q. Okay.	6	Affairs.
7	A. But if it was available I would use it.	7	Q. Okay. Do you know who wrote this
8	Q. Okay. I'm just going to scroll through	8	letter?
9	this, I might be done with this.	9	A. Nope. No, I'm sorry.
10	You know, that's all I have on this.	10	Q. Okay. Do you have any speculation as
11	Thank you for clarifying your testimony on this.	11	to who wrote this letter?
12	A. Okay.	12	A. No.
13	Q. I'm going to stop sharing my screen.	13	MR. GREEN: Objection.
14	Now, Ms. Cintron, I'm actually going to	14	THE WITNESS: No.
15	pull up a document that we looked at your first half	15	BY MS. ULAK:
16	of your deposition. This was previously marked as	16	Q. Okay. I'll take this letter down.
17	PAL-4.	17	I'm now going to turn your attention to
18	A. Okay.	18	what was previously marked at your deposition as
19	Q. I'm just getting it handy.	19	PAL-2.
20	Ms. Cintron, do you recognize this	20	MR. GREEN: PAL-2?
21	document?	21	MS. ULAK: Yes, it's the amended
22	A. Uh-huh.	22	complaint.
23	Q. Yes?	23	MR. GREEN: Okay.
24	A. Yes.	24	BY MS. ULAK:
1	Page 88 Q. Okay. And you see at the bottom	1	Page 90 Q. Ms. Cintron, can you see my screen
2	A. I have to read I have to read it	1	here?
	though.	3	A. Yes.
4	Q. Yeah, of course. I'm sorry, you tell	4	Q. Okay. So this is the amended
	me if you need me to scroll, okay.	1	complaint. It was marked as PAL-2, we looked at it
6	A. Okay.	1	at your previous deposition, I am going to bring you
7	Q. I'm going to keep scrolling so you get	1	down to paragraph 54 of this complaint, so you're
, 8	to see	1	going to see me scroll kind of quickly. And I just
9	A. Wait a minute, go back up a little bit.	1	want you to take a moment I'll take a moment and
	Can you go up a little bit?	1	highlight on here that you read paragraph 54.
11	Q. Yeah, sure.	11	A. Uh-huh. Do you want me to read it?
12	A. Right there.	12	Q. No. No, I want to give you the chance
13	Q. Okay.	1	to read it and then you tell me when you're done.
14	A. Okay. This is the letter that somebody	14	
	sent that you showed me the first time?	15	Q. Okay. So looking at this paragraph it
16	MR. GREEN: Sharon, can Sharon, can	1	says as she reviewed the anonymous letter, plaintiff
17	you go back to the first the very first	1	immediately recognized the letter contained subject
18	the beginning of this particular okay. I	1	matter which was actually provided to her by her
19	see it now.	1	to Sullivan exclusively.
		1	
20	MS. ULAK: Again, this was marked as	20	
21	PAL-4 at the October 28th deposition.	1	in your complaint that you filed?
	MR. GREEN: Okay, right, okay.	22	
23	THE WITNESS: This looks like the	1	immediately noticed that there was the officers and
24	letter that they showed me when I went to	124	the persons mentioned in that letter were the

	Page 91		Page 93
	disgruntled officers that I was dealing with and I	1	Q. Okay.
2	had shared all of this information with Sullivan and	2	A. And only to Sullivan.
	ironically they're the same people that are in this	3	Q. I also see a mention of Sergeant
	letter after Sullivan called Sergeant Faust to his	ΙI	Pascucci in this letter. Had you ever discussed
5	office.	5	Sergeant Pascucci with Joe Sullivan?
6		6	A. Yes, I had told Sullivan that I had
	just want to be clear, you testified you do not know	ΙI	sent Sergeant Pascucci to inform Officer Little that
8	who wrote that letter?	ΙI	she needed to refrain from talking about an ongoing
9	A. Nope.	9	investigation, but the letter seems like it was
10	Q. Okay. And you don't have an idea of	10	something totally different.
11	who might have written the letter, right?	11	Q. Okay. What was the ongoing
12	A. Nope. I just noticed it was	12	investigation?
	disgruntled officers mentioned in that letter that I	13	A. I thought it was because of the
14	had mentioned to Sullivan.	14	originally I thought it was because of the argument
15	Q. Okay.	15	between the civilian and the officer, but then I got
16		16	a subpoena saying that I was the target of an
17	write-up for what we discussed previously that he	17	investigation.
18	told me to leave alone.	18	Q. Well, I'm asking you what was the
19	Q. Okay. I'm going to pull this down and	19	ongoing investigation that you had Sergeant Pascucci
20	we're going to pull up PAL-4 again. Okay, so I'm	20	talk to Officer Little about?
21	going to bring your attention back to PAL-4 and what	21	A. Like I said originally I thought it was
22	I'm going to ask you to do is tell me what in PAL-4	22	the investigation that we started that we reported to
23	is information that you provided exclusively to Joe	23	Internal Affairs about officer the officer and the
24	Sullivan?	24	civilian having an argument, but later on I received
1	Page 92 A. The message to Officer Little is	1	Page 94 a subpoena that I was the target, so that's what I
2	that what's in there, in this letter is	2	was referencing to, not about the investigation
3	inaccurate, but I did mention to him, to Sullivan	3	between the civilian and Officer Klayman because
4	that I had to have the sergeant speak to Officer	4	Officer Little it was brought to my attention by
5	Little because it was an ongoing investigation and	5	several officers that Officer Little was going around
6	according to policy they're not supposed to be	6	talking about this investigation to the rest of the
7	discussing an investigation.	7	officers.
8		8	Q. And what was she saying about the
9	because I didn't say a lot of the stuff that's I	9	investigation?
10	didn't say what's in this letter.	10	A. She was trying to get them involved in
11	Q. Okay.	11	the investigation by telling them to say things that
12	A. So it seems to me that Officer Little	12	weren't true and they told her like don't get us into
13	because she had been reprimanded previously and was	13	that because that has nothing to do with us, and
14	upset about it, made it up made up some lies in	14	that's why I told the sergeant tell her that this is
15	this letter, if it was her, I don't know.	15	an ongoing investigation, that she can't be
16	Q. Okay. Saying if it was her do you	16	encouraging people to tell lies or whatever, but I
17	think it could have been Officer Little who wrote	17	didn't tell him to tell her all of that. I just told
18	this letter?	18	him to tell her that this is an ongoing
19	A. I don't know if it was her, but I	19	investigation, that she needs to refrain from talking
20	noticed that she that what she's saying in the	20	about an ongoing investigation.
21	letter or whoever wrote this letter obviously knew	21	Q. Okay.
22	that Little was a disgruntled employee.	22	A. And that's according to policy, so I
23	Q. Okay.	23	didn't tell her anything that I wasn't in my right as
24	A. Which I had mentioned to Sullivan.	24	a commanding officer to tell her.

Page 95		Page 97
1 Q. Okay. And I want to be clear, you	1	Q. Yes?
2 don't know who wrote this letter?	2	A. Yes.
3 A. Nope.	3	Q. What's the date on there?
4 Q. And you don't have a suspicion as to	4	A. October 27, 2017.
5 who wrote the letter?	5	Q. Okay. And I just want to be clear, at
6 A. Like I said, because of the names on	6	the beginning it says October 13, 2017 and and
7 the letter and the complaint, I'm imaging it was	7	does this refresh your memory at all as to when the
8 disgruntled employees and since one of them was	8	incident between Officer Klayman and Chase Trimmer
9 Sergeant Faust communicating with Sullivan, I don't	9	occurred, did it occur in 2017 or 2018?
10 know where this came from.	10	A. It was 2017.
11 Q. Is Sergeant Faust mentioned anywhere in	11	Q. Okay. Thank you. I'm going to
12 this letter?	12	A. This letter surfaced a few weeks after
13 A. I don't I got to read a little bit	13	the incident.
14 more.	14	Q. Okay.
Q. Okay. I'll give you a minute to	15	A. Or a week or two as I recall.
16 continue reading it.	16	Q. Okay. I'm going to take this down
MR. GREEN: Can you scroll it from the	17	then.
18 beginning?	18	So you had testified that you heard
MS. ULAK: Okay, I'll start at the	19	Sergeant Faust speaking with Officers Ragucci and
20 beginning.	20	Falco about having you removed from PAL. When did
21 BY MS. ULAK:	21	you overhear that conversation?
Q. And, Ms. Cintron, you tell me when you	22	A. Shortly after Sergeant Faust started
23 want me to scroll down, okay?	23	visiting Sullivan on a weekly basis.
24 A. You can scroll down.	24	Q. When did Sergeant Faust start visiting
Page 96		Page 98 Sullivan on a weekly basis?
2 A. No, I don't see Sergeant Faust but I	2	A. Yes, and when I spoke to him about
3 know that Sergeant Faust had met with Officer Little.	ΙI	jumping the chain of command, Sergeant Faust
4 Q. Okay.	ΙI	explained to me that Sullivan told him not to tell me
5 A. And I also caught Sergeant Faust	ΙI	that he was going up there, one. And two, that he
6 talking with Keith Falco and mentioned to him was	ΙI	told him to disregard me, you know, and go and,
7 talking about his meeting with Sullivan and how	ΙI	you know, he kept calling him to go up there.
8 and how they were going to get me out of there.	8	So in an essence, he was creating this
9 Q. You saw Sergeant Faust	ΙI	hostile work environment for me because the sergeant
10 A. Sergeant Faust was talking secretively	ΙI	became very cocky and very condescending and
11 with Keith Falco and Ragucci, Officer Ragucci at	ΙI	
	1 1 	disrespectful and he would blatantly violate the
	ΙI	disrespectful and he would blatantly violate the
12 Rizzo PAL when I went over there because there was an	12	rules and he would brag about how Sullivan was his
12 Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through	12 13	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side	12 13 14	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job.
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my	12 13 14 15	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and	12 13 14 15 16	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan?
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid	12 13 14 15 16 17	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid of me. And when they saw me, they were surprised to	12 13 14 15 16 17	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian and the officer.
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid of me. And when they saw me, they were surprised to see me and tried and pretended to be talking about	12 13 14 15 16 17 18	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian and the officer. Q. So that started in October of 2017?
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid of me. And when they saw me, they were surprised to see me and tried and pretended to be talking about something else.	12 13 14 15 16 17 18 19	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian and the officer. Q. So that started in October of 2017? A. Yes.
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid of me. And when they saw me, they were surprised to see me and tried and pretended to be talking about something else. Q. Okay. I just want to be clear about	12 13 14 15 16 17 18 19 20 21	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian and the officer. Q. So that started in October of 2017? A. Yes. Q. Okay. How many weekly meetings could
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid of me. And when they saw me, they were surprised to see me and tried and pretended to be talking about something else. Q. Okay. I just want to be clear about one thing, the stamp there's a date stamp	12 13 14 15 16 17 18 19 20 21 22	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian and the officer. Q. So that started in October of 2017? A. Yes. Q. Okay. How many weekly meetings could have taken place?
Rizzo PAL when I went over there because there was an event that I wanted to attend and I walked through the doors, I overheard them talking in the side office saying the deputy, which is what caught my attention, and Sergeant Faust was laughing and bragging about how they were working on getting rid of me. And when they saw me, they were surprised to see me and tried and pretended to be talking about something else. Q. Okay. I just want to be clear about	12 13 14 15 16 17 18 19 20 21 22 23	rules and he would brag about how Sullivan was his buddy and and things like that, so it was making it very hard for me to do my job. Q. Okay. When did Sergeant Faust start going to these weekly meetings with Deputy Sullivan? A. After the incident between the civilian and the officer. Q. So that started in October of 2017? A. Yes. Q. Okay. How many weekly meetings could

		_	
1	Page 99 didn't tell me. The second time you know, the	1	Page 101 would cause me the inability to do my job properly
2	subsequent times he would tell me the deputy wants me	2	because, in essence, the sergeant who was my
3	to come to his office and he would just leave.	3	subordinate staff, was telling me the deputy wants
4	Sullivan wouldn't contact me to see if the sergeant	4	this, the deputy wants that because the deputy at
5	was on another assignment, he won't contact me to let	5	some point wouldn't even talk to me. So I felt that
6	me know. He was just calling the sergeant to come	6	they were undermining my command by having a sergeant
7	see him.	7	tell me what to do.
8	Q. Okay. And am I understanding your	8	Q. Okay.
9	testimony correctly that Sergeant Faust would tell	9	A. And making my job more difficult with
10	you that he was visiting Deputy Sullivan and that	10	this disgruntled employee who was coming back with,
11	Deputy Sullivan told him not to tell you what he was	11	you know, the ability to do whatever he wanted
12	doing?	12	because he was being protected by Sullivan who told
13	A. No, the first time when he was seen at	13	him not to not to do any take any disciplinary
14	the roundhouse at Deputy Sullivan's office and I	14	action against him.
15	found out about it and I approached him and asked him	15	Q. Now, Ms. Cintron, you had testified
16	why is he jumping the chain of command, he said the	16	that you heard Sergeant Faust and Officer Ragucci and
17	deputy called me to his office but he told me not to	17	Officer Falco talking about how the deputy was trying
18	tell you. After that he would just say I have to go	18	to get rid of you and get you out of PAL and you
19	to the deputy's office and he would leave.	19	heard them your testified you heard them talking
20	Q. Okay. But okay. But he would tell	20	at Rizzo PAL, when did this conversation take place?
21	you he was going to Deputy Sullivan's office?	21	A. All of this, as far as the sergeant
22	A. After the first time.	22	going up, it happened after the incident with the
23	Q. Okay.	23	the officer and civilian staff
24	A. And I kept telling him he needed to	24	Q. Okay.
	Page 100	П	Page 102
1	stop jumping the chain of command. He would not	1	A member.
		ΙI	
	listen and since Sullivan is my superior he would	2	Q. You testified you were arriving at
3	have to follow the deputy's orders.	3	Rizzo PAL for an event?
3 4	have to follow the deputy's orders. Q. So he's following the deputy's orders,	3	Rizzo PAL for an event? A. Yeah, they were having a mentorship
3 4 5	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he?	3 4 5	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was
3 4 5 6	have to follow the deputy's orders. Q. So he's following the deputy's orders,	3 4 5	Rizzo PAL for an event? A. Yeah, they were having a mentorship
3 4 5	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he?	3 4 5 6	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was
3 4 5 6	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time	3 4 5 6 7	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event.
3 4 5 6	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that	3 4 5 6 7	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is
3 4 5 6 7 8	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please?	3 4 5 6 7 8	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters.
3 4 5 6 7 8	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat	3 4 5 6 7 8	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the
3 4 5 6 7 8 9	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it?	3 4 5 6 7 8 9 10	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people?
3 4 5 6 7 8 9 10	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * (Whereupon, the requested portion of	3 4 5 6 7 8 9 10 11	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to
3 4 5 6 7 8 9 10 11 12	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * (Whereupon, the requested portion of	3 4 5 6 7 8 9 10 11	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little
3 4 5 6 7 8 9 10 11 12 13	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * (Whereupon, the requested portion of the testimony was read back by the court	3 4 5 6 7 8 9 10 11 12 13	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette.
3 4 5 6 7 8 9 10 11 12 13 14	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * (Whereupon, the requested portion of the testimony was read back by the court	3 4 5 6 7 8 9 10 11 12 13 14 15	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay.
3 4 5 6 7 8 9 10 11 12 13 14	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * * (Whereupon, the requested portion of the testimony was read back by the court reporter.) * * * * * *	3 4 5 6 7 8 9 10 11 12 13 14 15 16	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying
3 4 5 6 7 8 9 10 11 12 13 14 15 16	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * * (Whereupon, the requested portion of the testimony was read back by the court reporter.) * * * * * * BY MS. ULAK:	3 4 5 6 7 8 9 10 11 12 13 14 15 16	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying do some repairs not repairs, but they were
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * * (Whereupon, the requested portion of the testimony was read back by the court reporter.) * * * * * * BY MS. ULAK: Q. Ms. Cintron, you can answer.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying do some repairs not repairs, but they were remodeling over there.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * * (Whereupon, the requested portion of the testimony was read back by the court reporter.) * * * * * * BY MS. ULAK: Q. Ms. Cintron, you can answer. A. Okay. The first time he the problem	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying do some repairs not repairs, but they were remodeling over there. Q. Okay.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? * * * * * (Whereupon, the requested portion of the testimony was read back by the court reporter.) * * * * * BY MS. ULAK: Q. Ms. Cintron, you can answer. A. Okay. The first time he the problem wasn't per se jumping the chain of command. The	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying do some repairs not repairs, but they were remodeling over there. Q. Okay. A. That's where Officer Ragucci was
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? ***** (Whereupon, the requested portion of the testimony was read back by the court reporter.) ***** BY MS. ULAK: Q. Ms. Cintron, you can answer. A. Okay. The first time he the problem wasn't per se jumping the chain of command. The subsequent times, even though he did it the first	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying do some repairs not repairs, but they were remodeling over there. Q. Okay. A. That's where Officer Ragucci was assigned to because he was our procurement officer.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	have to follow the deputy's orders. Q. So he's following the deputy's orders, he's not really jumping the chain of command, is he? A. The first time MR. GREEN: Before you answer that question, can you repeat it, please? MS. ULAK: Ms. Schumann, can you repeat it? ***** (Whereupon, the requested portion of the testimony was read back by the court reporter.) ***** BY MS. ULAK: Q. Ms. Cintron, you can answer. A. Okay. The first time he the problem wasn't per se jumping the chain of command. The subsequent times, even though he did it the first time, because the deputy was calling him to come to	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Rizzo PAL for an event? A. Yeah, they were having a mentorship program upstairs and Officer the officer that was working there had invited me to come up to the event. So I was going up there to talk to the kids which is the building next to the headquarters. Q. Okay. And so when you entered the building where were these three people? A. When you enter Rizzo PAL immediately to your right there's what used to be like a little kitchenette. Q. Okay. A. And they were working over there trying do some repairs not repairs, but they were remodeling over there. Q. Okay. A. That's where Officer Ragucci was assigned to because he was our procurement officer. The procurement was over there. Officer Ragucci and

1 t	Page 103 here because it's like a doorway. So when I walked	1	Page 105 2:12 p.m. and we're off the record.
2 i	n they were laughing and giggling and saying these	2	* * * *
3 t	hings, so immediately like I when I heard them	3	(Whereupon, an off the record
4 m	ention my name, obviously, you know, I was within	4	discussion was held.)
5 h	earing distance and I heard them say what I told you	5	* * * *
	hey said about oh, we're going to get rid of her and	6	THE VIDEOTAPE OPERATOR: The time is
	hey were laughing and just carrying on but about	7	2:13 a.m. and we're back on the record.
	ow, you know, they were going to get rid of me. And		BY MS. ULAK:
	hen when they saw me they were in shock that it was	9	Q. Okay. So you came to learn of the
	e and they tried to act like they were talking about		letter at Internal Affairs?
	omething else, but I already had heard what I had	11	A. Yes.
	eard.	12	Q. Okay. And you say what happened,
13	Q. So this is a conversation they were aving openly at PAL, but they just didn't think you		how did this all come to your attention?
		14	A. I received the subpoena to report to
	ere nearby?		Internal Affairs, it stated that I was a target and I
16	A. Right, because I'm assigned to the		thought I was going down there to be interviewed
	ther building and there's nobody else in that		about the incident that took place and they presented
18 b	uilding.	18	me with the letter.
19	Q. Okay.	19	Q. Okay. When did you receive a letter
20	A. Upstairs, Rizzo PAL is upstairs.	20	saying you were the target?
21	Q. Okay. Let's go back to this	21	A. It's a subpoena that I received, I
22	MS. ULAK: Actually, why don't we go	22	don't remember the exact date on it.
23	off the record for a second.	23	Q. Did you receive it before you went down
24	MR. GREEN: I'm sorry?	24	to Internal Affairs?
1	Page 104 MS. ULAK: Let's go off the record for	1	Page 106 A. Yes.
2	a second.	2	Q. Okay. And when you said you thought it
3	MR. GREEN: Okay.	3	was about the incident that took place, we can agree
4	THE VIDEOTAPE OPERATOR: The time is	4	it was the incident between Officer Klayman and Chase
5	12:56 p.m. and we are off the record.	5	Trimmer, correct?
6	* * * *	6	A. Yes.
7	(Whereupon, a luncheon recess was	7	Q. And what happened when you got down to
8	taken.)	8	Internal Affairs and you saw the letter, what
9	* * * *		happened next?
10	THE VIDEOTAPE OPERATOR: The time is	10	A. I just gave my interview. They took an
11	2:11 p.m. and we are back on the record.		interview and that was it, but about they
	-		·
	Y MS. ULAK:		questioned me about the letter, they questioned me
13	Q. Okay. Ms. Cintron, welcome back.		about the incident. I just gave my Internal Affairs
14	A. Okay.		interview.
15	Q. All right. So I want to talk to you a	15	Q. To whom did you give the interview?
	ittle bit more about what happened after that	16	A. With detective what's his name? I'm
	nonymous letter was sent to the police department,		at a loss for his name now. I forget the name of the
	nd you testified you don't know who wrote that		investigator.
	etter. How did you come to learn about the letter?	19	Q. If I told you it was Fred Conway, would
	A. At Internal Affairs.	20	that does that sound correct to you?
19 1		20 21	that does that sound correct to you? A. Conway, yes, it was Conway.
19 le	A. At Internal Affairs.		
19 10 20 21	A. At Internal Affairs. (Technical difficulties.)	21 22	A. Conway, yes, it was Conway.

Page 109 a referring to. I did explain I was the one that reported th the two to Sullivan and I the investigation turned on me. Porting it to Sullivan, but I t words, but I do remember going through all this stuff at Eves. What was the stuff that at you were going through at the being treated, how they were for speaking up about for ters and the kids and making
th the two to Sullivan and I the investigation turned on me. porting it to Sullivan, but I t words, but I do remember going through all this stuff at yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
porting it to Sullivan, but I to words, but I do remember going through all this stuff at eyes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
porting it to Sullivan, but I t words, but I do remember going through all this stuff at yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
t words, but I do remember going through all this stuff at yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
t words, but I do remember going through all this stuff at yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
t words, but I do remember going through all this stuff at yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
going through all this stuff at yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
yes. What was the stuff that at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
at you were going through at s being treated, how they were for speaking up about for ters and the kids and making
s being treated, how they were for speaking up about for ters and the kids and making
for speaking up about for ters and the kids and making
for speaking up about for ters and the kids and making
ters and the kids and making
_
re not happy with, and I
the MOU had just been it
d that the MOU was finalized
to be discussing that soon and
verything that I reported to
turned against me from what I
carnea agarnee me rrem mae r
Page 110
I was experiencing.
is it that you say was
ı, was that PAL employees?
ld them it was PAL, as well as
s. Cintron, I am going to pull
s City-2. Just give me one
an you see my screen?
ou see at the top it says
t Evelyn Cintron?
t also says in the presence of
e. Is that the attorney for
you?
'm going to represent to you
view, I think it's actually all
you gave to Internal Affairs
nt Conway, and I'm just going
through this slowly, but do you
pute this is your interview?
view, I think it's actually you gave to Internal Affai

_			
1	Page 111 A. No.	1	Page 113 Ted Qualli exaggerating what happened that day as
2	Q. Okay.	2	another way to create another situation that would
3	A. I haven't seen the whole thing but I	3	get me in trouble.
4	see my signature.	4	Q. Okay.
5	Q. Okay. So at the bottom of each page	5	A. Because when this incident happened it
6	we're going to see a signature and you have no reason	6	was an argument between two people and their
7	to dispute that you signed off on each page, right?	7	statements, and his communication to Sullivan was not
8	A. Right.	8	accurate in what actually happened.
9	Q. Do you get to see this document before	9	(Simultaneous crosstalk.)
10	you sign off on it?	10	BY MS. ULAK:
11	A. They tell you to sign off each page	11	Q. How is it inaccurate I'm sorry.
12	once they print it.	12	A. One, he was not there during the
13	Q. Okay. And do you get the chance to	13	incident. Before he wasn't answering my phone calls
14	read it before you sign it?	14	and went directly to Sullivan who immediately took
15	A. Yeah. Yes.	15	his side, he sided with Ted Qualli and made certain
16	Q. I'm just going to go kind of slowly	16	well, Ted Qualli and I called Sullivan to explain
17	through this, but we're not going to go through this	17	to him that Ted Qualli had made some decisions like
18	interview word-for-word. I just want to get to the	18	sending everybody home without talking to me about
19	end of your first interview with Internal Affairs.	19	what took place and created a potential, you know,
20	Okay. So I'm on what's been previously	20	panic in the unit when that was not necessary and
21	Bates stamped as City 152, it is the 16th page of	21	that's what I was referring to in this statement.
22	City-2, and looking at this document I see that there	22	Q. Okay.
23	is a question, is there anything else that you would	23	A. And then he came and yelled at me which
24	like to add that has not been addressed in this	24	I also told Sullivan about it but he didn't do
1	Page 112 interview? Answer, and then there's a handwritten	1	Page 114 anything about it, and I also wanted to let Conway
	paragraph. And are you able to read this paragraph?	ΙI	know that right before I was scheduled to come to my
3	A. Yes.	ΙI	interview he came into my office to yell at me.
4	Q. Okay. I would actually like it if you	4	Q. That's Ted Qualli came into you office?
5	are able to if you could read this paragraph out	5	A. Yes. So I felt like he was doing that
6	loud just because I don't want to interpreting your	6	to to intimidate me as well as, you know, trying
7	handwriting here.	7	to create another situation to make this situation
8	A. I would like to document that Ted	8	even worse.
9	Qualli has continued to attempt to create situations	9	Q. Okay.
10	for which he wants to argue with me and intimidate	10	A. So that's what I was referring to, him
11	me. He is subjecting me along with a few members of	11	yelling at me trying to provoke me I guess or
12	the staff to a hostile work environment. Friday he	12	intimidating me because he knew I was going to
13	came into my office to yell at me and berate me about	13	Internal Affairs. But all of this that's in the
14	PAL-related matters in his attempt to have me be	14	statement I had spoken to Sullivan about and he did
15	removed from the unit. I feel that the incident	15	nothing about the fact that Ted Qualli came into my
16	involving Officer Klayman and Chase Trimmer was used	16	office yelling at me. I submitted a memorandum to
17	as a platform to drive personal agenda.	17	Sullivan in reference to this last incident that
18	Q. At no point in this paragraph do you	18	happened before I went to my meeting.
19	mention Joe Sullivan; am I right?	19	Q. You sent a memorandum to him in
20	A. I didn't mention him in this in this	20	reference to Ted Qualli coming into your office and
21	situation because I felt that this was about the	21	yelling at all?
22	incident involving two individuals. Ted Qualli had	22	A. Yes, and he didn't do anything about
23	called Sullivan and I had called Sullivan and	23	it.
1	explained to him what's in this statement in terms of	24	Q. Okay. Was there anything else that you

Page 115 were concerned about that you addressed with Brent notified of any wrongdoing. I was never given notice Conway during your interviews with Internal Affairs? 2 that there was any wrongdoing or that they found me Yes, I was concerned because Conway guilty of anything. As far as I was concerned it was 3 expressed to me that he tried close the case because over with and they didn't find anything. 5 he couldn't find anything against me and he said I'm You were never disciplined for anything 6 not afraid to go up against deputies who like to related to this, right? 7 bully people, but this is clearly a witch hunt. 7 Α. Nope. Nope. 8 They're trying to close this case because I can't 8 Okay. You had testified earlier 9 find anything that you did wrong but Sullivan told me 9 about -- about how you had Sergeant Pascucci speak or instructed me to keep digging. with Janice Little, am I remembering that correctly? 10 10 11 Let me stop sharing this. 11 12 To your knowledge, what was the outcome Okay. How was your working of the Internal Affairs investigation? relationship with Officer Little? 13 13 14 When I did my exit interview, I was Officer Little is great with the kids. 15 told by the Deputy Commissioner Wimberly that I 15 The only thing is with Officer Little she likes to 16 should not leave the department because I had a good 16 deviate the rules to her advantage, and when I first 17 working record and she said they didn't find got to PAL Ted asked me to speak to her because she 18 anything, so you should not let people run you off 18 would go and spend her own money to buy stuff for 19 the job. And I explained to her that this was about PAL-related events which is a PAL rule that they're 19 20 my health and me going through everything that I went not supposed to do. 21 through was jeopardizing my health and she suggested 21 So when I got there to PAL she already 22 that I take a nonpaid leave status, and I told her had a situation like that before my arrival to PAL that I would be willing to do that, but my year had and she wanted to get reimbursed for spending her own 24 expired to be on family leave according to the rules money on PAL-related events that they had declined Page 118 Page 116 and at that point she called Deputy Commissioner 1 her to do because the way that it works is that the 1 Coulter who was the approving -- the person that officers submit a memo requesting what they want and would approve for me to go on nonpaid status medical then it goes through an approval process of what they 4 leave, but Deputy Commissioner Coulter denied the 4 can and cannot do in terms of that program or event, 5 request and was not letting me go out on nonpaid and whatever they get approved for in terms of status which forced me to retire. finances that's what they're allowed to spend. 6 And I want to clear here, to your And Sunny Li as the chief financial knowledge, did the Internal Affairs investigation officer would give them either a check or petty cash sustain any wrongdoing on your part? to handle, you know, the finances. 10 At that point, I didn't know because The rule in place is that they're not 10 11 Wimberly, Deputy Commissioner Wimberly who was in supposed to spend their own money, but Officer 12 charge of Internal Affairs told me they didn't find Little, according to Ted Qualli she had did this anything. So to my knowledge they didn't show me 13 several times and right before I got there she did it 13 14 anything, they didn't give me anything. But in again and he did not want to reimburse her because it her -- she explicitly told me they didn't find was something that was becoming a habit of Officer 16 anything, so I'm assuming everything was done and 16 Little to get what she wants, you know, even though 17 over with at that time. stuff was declined. So we rectified that situation 18 It wasn't until recently that I found 18 by reimbursing her for that incident. 19 out that they put something in my record as far as 19 Fast forward. I would say less than a 20 finding me guilty about stuff that is not accurate. 20 year later she did it again. Again Ted Qualli and I 21 Did you ever have a PDI hearing in sat down with her and told her she cannot go in her 22 pocket to spend money. Sunny Li decided to reimburse 22 relation to this incident? 23 No, because according to Deputy 23 her again because there was an excess of funds in

other areas so she said I'm only going to do it

Wimberly they didn't find anything. I was never

Page 121 rain from talking
-
people witness the
nd Chase Trimmer?
, Cassandra Harris
ssed the yelling
s that worked in
Sergeant Pascucci
ou believe he
m to talk to her
clear that to tell
gation. I mean
her it was an
from speaking on an
show you what we're
see this?
t this, are you
Page 122 3, what letter?
rnal Affairs showed
g you that.
at the top it says
ntron, sent
·
McCauley.
similar for a
you might think it
trying to be clear
s office gossip and
ng to give you a
, you let me know
is part and I'll
little bit. Okay.

Page 123 Page 125 ο. Okay. What was the purpose of sending When you have an employee starting 2 this e-mail? rumors about the commanding officer and blatantly When this situation happened I spoke to being disrespectful, it undermines my command when 3 you're tying to cause all these problems on the Ted Qualli and I spoke to Chase Trimmer. I went to 5 Chase Trimmer first because he had oversight over workplace, it was also becoming a hostile work Nadarih McCauley and I said to him we have a environment for me, which is what I wanted Ted to address but he refused to do that. I mentioned this situation here that we need to address with Nadarih. 8 Giving them the opportunity to speak to her about 8 to Sullivan who didn't do anything about it. 9 this situation. Okay. Chase Trimmer refused to speak to her But called me after this letter was 10 10 Α. 11 and he called Ted Qualli to come join us in the 11 forwarded to him to tell me that I am not to speak to 12 meeting. I said -- as a matter of fact, I said as 12 officer -- to speak to Nadarih or anybody else about matter of fact call Ted where he can be here present 13 any of this. So not only my concerns were not 13 while we discuss this because my understanding is addressed, but they were laughing about it. They 15 that you, as her immediate supervisor, refused to 15 didn't care how hostile the environment was for me They didn't care how I was being intimidated in the 16 talk to her about this. And then -- we called Ted 16 17 Qualli to join the meeting. workplace. 18 When Ted Qualli joined the meeting, I 18 Now, Ms. Cintron, I just want to turn Ο. told him what was going on, what was brought to my your attention to the second paragraph from the 19 19 20 attention and Ted Qualli immediately said -- he bottom, it just says I did get a follow-up e-mail 21 started laughing and he said people can say whatever from Ted stating that you denied being involved, but 21 acknowledged speaking to Officer Jackie Little who 22 the hell they want, and I said -- and I reiterated to 22 him that when there was a rumor about was also mentioned as being involved. 24 misappropriation of funds coming from Ted Qualli, he 24 Officer Little, is that the same -- is Page 124 Page 126 asked me to address the officers that were, you know, that the same officer who is mentioned in the letter 1 2 starting this rumor and I gave him the courtesy to 2 to Internal Affairs? sit down with the officers to ensure that this does Α. 4 not happen in the workplace because it deviates from Ο. Okay. What was the purpose of this 5 the job that we have to do. sentence mentioning Officer Little? So whenever Ted Qualli had an issue Because after we had that meeting, Ted with officers, I would make sure we call the officers had sent me an e-mail saying she said she wasn't involved in any of that, she, Nadarih, meaning 8 in and we would discuss the matter and I would instruct my officers to, you know, whatever they were Nadarih, mentioned Officer Little as the one that was 10 doing that was disrespectful to Ted that would involved. 10 11 correct the situation, but he did not give me the 11 Q. Okay. same courtesy. He laughed and said that people can 12 So basically they were pointing the say whatever the hell they want and that he wasn't 13 fingers at each other. Officer Little and Nadarih 13 14 going to say nothing to Nadarih. And I said are you 14 were pointing fingers at each other. 15 serious? You're not going to address this matter? Did you ever confront Officer Little And he said no. So I had no other choice but to send 16 16 for spreading rumors about you and Officer Klayman? 17 Nadarih this e-mail to let her know that this was my 17 Officer Little came to my office and 18 position on the matter. 18 she made a comment that was very interesting to me 19 Ο. Okay. So I want you to be --19 because she made a comment and said to me had you 20 Because they refused to take 20 booked my reimbursement, seriously I wouldn't have 21 disciplinary action or address her about the matter. done what I did. And when she made that remark I 21 2.2 22 felt that if this turns into something bigger I Okay, but I want to be clear here, what 23 is the matter? When you say the matter, what is the didn't want to question her without proper 23 matter? representation because there's a different process

Page 127 1 for a civilians and there's a different process for	1	Page 12 Q. When did you go to move him from his
2 officers.	2	shift?
3 Had I questioned her without proper	3	A. I can't remember the month or the date.
4 representation then I would have been in violation of	4	I can't remember the date or the month.
5 questioning her about something that was an ongoing	5	Q. Okay. I'm going to show you what's
6 investigation.	6	been marked as City-4 or what I will mark as City-4.
7 Q. How long did you work with Sergeant	7	A. Uh-huh.
8 Faust for?	8	Q. Give me one moment.
9 A. How long what?	9	Looking at this it's a memorandum, it's
10 Q. How did you work with Sergeant Faust	10	addressed to Sergeant Faust, it's from commanding
11 for?	11	officer Police Athletic League. Are you able to see
12 A. For the time that I was at PAL.	12	it?
Q. Okay. And what was his shift while he	13	A. Yes.
14 worked at PAL with you?	14	Q. Okay. And does this memorandum look
15 A. Both sergeants were supposed to rotate	15	like a memorandum you might have sent?
16 shifts. They were supposed to be Monday through	16	A. Yes.
17 Friday, eight to four for two weeks and then he would	17	Q. Okay. And what's the date at the top?
18 switch to four to 12. When I first got there because	18	A. 11/6/17.
19 he was also handling administrative stuff, I allowed	19	Q. And what is the subject of this memo?
20 him to stay eight to four for the time being until I	20	A. Shift reassignment.
21 learned my way around, but when I tried to move him	21	Q. So it was November of 2017 when you
22 back to his regular shift, rotating shift, he	22	chose to reassign Sergeant Faust's shift; is that
23 complained to Sullivan who told me not to change his	23	correct?
24 shift. But the shifts between the sergeants are	24	A. Yes.
Page 128		Page 13
1 supposed to rotate because all the officers work from	1	Q. Okay.
2 two to 10 and he was in charge of half those	2	A. But prior to that we had several
3 officers.		meetings about it.
Q. Okay.	4	Q. Okay. Okay.
A. And he was supposed to be checking on	5	A. So he knew this was coming because we
6 the centers.		had discussed it previously.
Q. But sorry, go ahead.	7	Q. Okay.
8 A. But the other partner was overseeing	8	A. This memo is a standard memo that you
9 the entire City while I kept Sergeant Faust eight to		give someone when you're going to move them because
10 four to kind of show me around because he had been		you want to give them enough time to adjust their
11 there for so long so he could, you know, show me		home schedule, so you give them 30 days according to
12 around how everything works.		policy. So this is standard when you're changing
Q. And oh, sorry.		someone's shift and it's a contractual agreement with
14 A. And then he didn't want to switch back		the FOP.
15 to four two to 10 rather.	15	Q. Okay. So you would agree with me
Q. When did you try to move him?		though that moving him in November of 2017 was well
17 A. We actually had two meetings where we		after when you first arrived at PAL, right?
18 discussed the length of time that he would be on day	18	A. Yes. According to the date, yes.
19 work because I felt bad for Sergeant Pascucci	19	Q. Okay. And was this after the letter
20 first Sergeant Pascucci who was having to go from one		was sent to Internal Affairs?
21 part of the City to the next to supervise officers	21	A. It was after the incident, but I don't
22 and we had discussed it in several meetings, but when		
00		recall I had seen the letter by then.
23 I went to move him from his shift, he made the call 24 to Sullivan and I was told to leave him alone.	23	Q. Okay. We discussed this earlier, the letter was dated October 27, 2017, so this memo came

Page 131 Page 133 after the letter was sent or at least after the to express myself, he said I don't want to hear, I 2 letter was received by Internal Affairs. Would that 2 don't want to hear, Evelyn leave, Evelyn leave, 3 be accurate to say? 3 Evelyn leave, I don't want to hear it, go talk to him, go talk to him. He literally didn't want to Well, what I'm trying to say is that I 5 don't know if I have gone and given my interview at 5 hear anything. this time. I don't think I had gone and given my And I said, well, I'm coming to you interview which means I wouldn't -- I didn't know because as his supervisor this is policy, I'm 8 about the letter. 8 supposed to go to higher up if who I'm complaining about is my immediate supervisor and, again, he said Okay. By the time that you had sent that memo though, had you -- you had already go talk to him, go talk to him and he basically 10 11 addressed your concerns about rumors with Nadarih, 11 kicked me out of the office and directed me to go 12 right? back to Sullivan. 13 If -- if the date is before then, then When I went to the Sullivan's office, 13 14 yes. 14 Sullivan told me that better be the last time you try 15 Okay. 15 to circumvent me and go to a higher rank, and I said 16 Α. My decision to move Sergeant Faust had 16 well, with all due respect if I'm complaining about nothing to do with the incident. This was something 17 17 you I followed policy. So my job was to go through 18 we spoke about months prior. He signed off on it 18 your supervisor because I'm not getting any results 19 months prior during our meeting because I would have with you and you're not listening to any of my 19 20 them sign off on our meetings and what we discussed concerns and you keep siding with the Board. 21 during our meetings, so he was aware of this way 21 So we basically had that conversation, before this incident. 22 and he told me at that point that I were to never ο. Okay. We know that you have testified contact anybody above him ever again. 23 24 today that you had complained to Joe Sullivan about 24 Ο. Okav. Page 134 1 complaints you had working at PAL. Did you make any So he basically cut off my opportunity complaints to anybody else within the City of 2 to report through the departmental means according to 3 Philadelphia? policy. I attempted to, before Paterson retired Did you have other means within the being first deputy, Sullivan would be reporting to City of Philadelphia to report these concerns? 6 him as second deputy. So I went to Paterson to talk When I did my interview with Internal 7 to him about the stuff that Sullivan was doing and he 7 Affairs, they gave me an EEOC complaint form and they directed me to go back to Sullivan and didn't want to advised me to fill out an EEOC complaint form. But hear it, what I had to say. being that Sullivan who was the person I'm 9 10 And what was the stuff that Sullivan 10 complaining about was interfering with the 11 was doing that you were trying to complain about to investigation by calling the detective and telling 12 Paterson? 12 him to keep digging, I knew that it would not be 13 investigated fairly. So I decided that I would go 13 Undermining my command by having, you through the City, through my other means of reporting 14 know, subordinate staff report to him. Isolating me 14 by taking assignments that were under my purview to 15 an EEOC complaint. 16 handle. Having his sergeant listen in on my -- my 16 Ο. Okay. We're going to have to back up a 17 conference calls, siding with the PAL Board and it 17 little bit here. 18 being a conflict of interest because they support his 18 At Internal Affairs you received an 19 EEOC form and you did not fill it out. How did you 19 nonprofit, and him treating me less favorable than my 20 males -- the males that worked in the unit. 20 know Joe Sullivan was telling people to keep digging, 21 But when I went to speak to him -- when 21 how do you know it was him? 22 I went to speak to him he said that I needed to go 2.2 Α. Conway told me. 23 back to Sullivan and he didn't want to hear it. He 23 Brent Conway told you during your was literally talking -- saying -- every time I tried 24 Internal Affairs investigation that Sullivan was

$\overline{}$			
1	Page 135 telling you to keep digging?	1	Page 137 MR. GREEN: If you can't remember, you
2	A. Yes. He said he tried to close the	2	can't remember.
3	case several times and that they told him to keep	3	THE WITNESS: Okay.
4	digging. That Sullivan told him to keep digging, and	4	BY MS. ULAK:
5	he told that's when he told me that I would go	5	Q. Okay. I'm going to ask this a
6	against up any deputy because I know a witch hunt	6	different way, please let me get my question out,
7	when I see you know, I know one when I see it.	7	okay?
8	I've been doing this for too long.	8	I know that you filed a complaint with
9	Q. Okay. So then did you make an EEO	9	the EEOC under the representation of counsel.
10	complaint to the City of Philadelphia?	10	Did you make any complaints to perhaps
11	A. No, I didn't because I knew that it	11	the City of Philadelphia Employee Relations unit, to
12	would not be done fairly given what was going on with	12	the Mayor's Office of Labor?
13	the current investigation and how, you know, he was	13	A. No, I didn't know that was an option
14	trying to interfere in the investigation. And the	14	I don't recall if that was an option.
15	the department is known for, you know, minimizing	15	Q. Did you make a complaint to your Union?
16	what's going on if it's against a higher up. So I	16	A. Yes, I called the Union and they told
17	knew that it would not be a fair investigation that	17	me because I was a lieutenant they could not
18	would go on if you have the person that I'm	18	represent me.
19	complaining about telling an investigator to keep	19	Q. But you were represented by the Union
20	digging to see if he finds something negative against	20	at your Internal Affairs investigation?
21	me.	21	A. The Internal Affairs investigation, any
22	Q. Ms. Cintron, could you have made a	22	officer giving a statement regardless of rank gets
23	complaint to the City of Philadelphia outside of your	23	represented by an attorney.
24	departmental means?	24	Q. Okay. You're saying the Union couldn't
1	Page 136	1	Page 138
1	A. What was that?	ΙI	help you with this complaint because you were a
2	A. What was that? Q. Could you have made a complaint to the	2	help you with this complaint because you were a lieutenant
2	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental	2	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because
2 3 4	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means?	2 3 4	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing
2 3 4 5	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a	2 3 4 5	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did
2 3 4 5 6	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office?	2 3 4 5	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union.
2 3 4 5 6 7	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.)	2 3 4 5 6 7	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned
2 3 4 5 6 7 8	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the	2 3 4 5 6 7 8	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to
2 3 4 5 6 7 8	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint	2 3 4 5 6 7 8	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the
2 3 4 5 6 7 8 9	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department	2 3 4 5 6 7 8 9	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight.
2 3 4 5 6 7 8 9 10	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation.	2 3 4 5 6 7 8 9 10	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you
2 3 4 5 6 7 8 9 10 11 12	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK:	2 3 4 5 6 7 8 9 10 11 12	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer?
2 3 4 5 6 7 8 9 10 11 12 13	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to?	2 3 4 5 6 7 8 9 10 11 12 13	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer?
2 3 4 5 6 7 8 9 10 11 12 13	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not	2 3 4 5 6 7 8 9 10 11 12 13 14	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's	2 3 4 5 6 7 8 9 10 11 12 13 14 15	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's THE WITNESS: If that's what it's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any medical conditions?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's THE WITNESS: If that's what it's called?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any medical conditions? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's THE WITNESS: If that's what it's called? BY MS. ULAK:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any medical conditions? A. Yes. Q. What do you treat for?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's THE WITNESS: If that's what it's called? BY MS. ULAK: Q. So there is the EEOC I'm sorry.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any medical conditions? A. Yes. Q. What do you treat for? A. I have I have two I have
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's THE WITNESS: If that's what it's called? BY MS. ULAK: Q. So there is the EEOC I'm sorry. A. No, I was asking Mr. Green is that what	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any medical conditions? A. Yes. Q. What do you treat for? A. I have I have two I have hypothyroidism and they recently found two small
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. What was that? Q. Could you have made a complaint to the City of Philadelphia outside of your departmental means? Could you have made a complaint to a different office? (Simultaneous crosstalk.) THE WITNESS: I made a complaint to the Department of Human Services, the complaint that I made. I went outside of the department for fear of further retaliation. BY MS. ULAK: Q. Who did you make that complaint to? A. I believe it was the City I'm not sure. The Department of Human EEOC unit, the City's EEOC unit Q. Well, there's THE WITNESS: If that's what it's called? BY MS. ULAK: Q. So there is the EEOC I'm sorry.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	help you with this complaint because you were a lieutenant A. With the rank of lieutenant because you're in management is different than representing an officer in in investigations. But yes, I did contact my Union. Q. Okay. Ms. Cintron, you had mentioned earlier some health issues, I just want to talk to you briefly about that and we are coming towards the end of this deposition, so there is end in sight. In terms of health issues, have you ever had cancer? A. Have I ever had cancer? Q. Yeah. A. No. I have I had tumors that they had to remove that they checked for cancer for, yes. Q. Okay. Do you currently treat for any medical conditions? A. Yes. Q. What do you treat for? A. I have I have two I have

1 1	Page 139 and my pituitary gland.	1	Page 141 Q. The gentleman who was there before
2	Q. Why did you go out on leave from the	2	Deputy Dahl-Campbell, do you know what his race was?
3	City of Philadelphia?	3	A. He was a black male selected by Richard
4	A. That was due to stress, anxiety,	4	Ross to oversee the unit when I was out.
5	depression and PTSD-related symptoms.	5	Q. And then do you know when Dahl-Campbell
6	Q. And when did you when did you treat	6	became the commanding officer of PAL?
7	for that? When strike that.	7	A. She became the deputy commissioner of
8	A. I think it started it started like	8	PAL after this captain who got promoted to inspector
9	the end I believe the middle of 2017, it started	ΙI	I believe
10	after Sullivan was there.	10	Q. Okay. You said Deputy Commissioner
11	Q. Prior to that, had you ever treated for	11	A which was a few months later.
12	any mental health conditions?	12	Q. You say Deputy Commissioner
13	A. No, not	13	A. Can you repeat that?
14	MR. GREEN: Can you repeat that	14	Q. I'm sorry, I think we're having an
15	question, please?	ΙI	audio lag, I think that might be part of the problem.
16	Before you answer, Evelyn, before you	16	You say deputy commissioner of PAL, do
17	answer, I just need the question repeated.	ΙI	you mean commanding officer of PAL?
18	MS. ULAK: Renee, I'm sorry, can you	18	A. You're talking about the inspector, the
19	just repeat the question back. I don't	ΙI	person who got promoted to inspector?
20	remember what I asked.	20	Q. No, I'm talking about Krista
21	THE COURT REPORTER: Sure.	ΙI	Dahl-Campbell.
22	* * * *	22	A. Right. She would have gotten assigned
23	(Whereupon, the requested portion of	ΙI	by the deputy or the commissioner.
24	the testimony was read back by the court	24	Q. And just so we're clear, she's a woman?
	Page 140		Page 142
1	reporter.)	1	A. Yes.
2	* * * *	2	Q. Do you know who currently holds the
3	MR. GREEN: Thank you.	3	position of commanding officer of PAL?
4	THE COURT REPORTER: You're welcome.	4	A. No. All I know is that Deputy
5	THE WITNESS: Prior to that I I	5	Commissioner Campbell was working with me to get a
6	like everybody I got depressed once in a while	6	the 26th District open, center open which was
7	but it was never to the extreme of me having	7	which had the community in an uproar because Dahl had
	to go to a specialist about it.		
8	to go to a specialist about it.	8	gotten funding for the center three years prior to
	BY MS. ULAK:	ΙI	
		ΙI	gotten funding for the center three years prior to
9 10	BY MS. ULAK:	9 10	gotten funding for the center three years prior to open up the 26th District PAL center
9 10	BY MS. ULAK: Q. When did you start going to a	9 10 11	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron,
9 10 11	BY MS. ULAK: Q. When did you start going to a specialist?	9 10 11	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as
9 10 11 12 13	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017.	9 10 11 12	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL?
9 10 11 12 13	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as	9 10 11 12 13	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No.
9 10 11 12 13 14	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL?	9 10 11 12 13 14 15	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay.
9 10 11 12 13 14 15	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think	9 10 11 12 13 14 15	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar
9 10 11 12 13 14 15 16	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think it was a male captain selected by Ross who got	9 10 11 12 13 14 15 16	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar with as far as the captain.
9 10 11 12 13 14 15 16 17	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think it was a male captain selected by Ross who got promoted promoted thereafter a few months later	9 10 11 12 13 14 15 16 17	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar with as far as the captain. Q. Okay. Yeah, then you don't need to
9 10 11 12 13 14 15 16 17	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think it was a male captain selected by Ross who got promoted promoted thereafter a few months later and then they could the current Deputy	9 10 11 12 13 14 15 16 17	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar with as far as the captain. Q. Okay. Yeah, then you don't need to continue. This is not responding, there's no
9 10 11 12 13 14 15 16 17 18	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think it was a male captain selected by Ross who got promoted promoted thereafter a few months later and then they could the current Deputy Commissioner Dahl-Campbell.	9 10 11 12 13 14 15 16 17 18	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar with as far as the captain. Q. Okay. Yeah, then you don't need to continue. This is not responding, there's no question pending.
9 10 11 12 13 14 15 16 17 18 19 20	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think it was a male captain selected by Ross who got promoted promoted thereafter a few months later and then they could the current Deputy Commissioner Dahl-Campbell. THE COURT REPORTER: I'm sorry, what is	9 10 11 12 13 14 15 16 17 18 19 20 21	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar with as far as the captain. Q. Okay. Yeah, then you don't need to continue. This is not responding, there's no question pending. A. Okay. Okay. No problem.
9 10 11 12 13 14 15 16 17 18 19 20 21	BY MS. ULAK: Q. When did you start going to a specialist? A. 2017. Q. Ms. Cintron, who replaced you as commanding officer of PAL? A. I don't know who replaced me. I think it was a male captain selected by Ross who got promoted promoted thereafter a few months later and then they could the current Deputy Commissioner Dahl-Campbell. THE COURT REPORTER: I'm sorry, what is his last name?	9 10 11 12 13 14 15 16 17 18 19 20 21	gotten funding for the center three years prior to open up the 26th District PAL center Q. Hang on. Ms. Cintron Ms. Cintron, is this about who replaced Krista Dahl-Campbell as the commanding officer of PAL? A. No. Q. Okay. A. I'm just telling you what I'm familiar with as far as the captain. Q. Okay. Yeah, then you don't need to continue. This is not responding, there's no question pending. A. Okay. Okay. No problem. Q. While you were out on leave, did Deputy

Page 143 Page 145 that voicemail? came back from the conferences that we all had to go 2 2 to, my co-worker who I was assigned to a specific Δ She called me, she left a message 3 because I didn't answer the phone call and she left a 3 conference told me that my boss had spoke to Deputy message basically stating that she -- I can't say Commissioner Coulter at the conference and he said I word-for-word because I don't have it in front of me, 5 5 don't know what's coming but is there anything that 6 but something along the lines that she heard I was you need to speak to Greg Doren about? And I told under the weather. She mentioned something about the him no because when I applied for the job, without 8 job and if I needed to discuss anything work-related 8 bad mouthing the City, I told him that, you know, I 9 to give her a call, that -- and that she hopes I feel 9 had left in, you know, bad terms because of what 10 better. was -- you know, because of my stress and stuff like 10 11 Ο. Okay. But --11 that. 12 I don't know all the words, but that 12 And I think it was that Monday or Tuesday that he called me to tell me that they no 13 was the gist of it. 13 14 Ο. Okay. What was your understanding of 14 longer needed me. 15 why she left you that voicemail? Okay. So you testified that there was a conversation between Deputy Coulter and Greg Doren? 16 Well, I returned her phone call once I 16 17 realized she called and I had missed the call and we 17 18 talked about what was going on and how I felt about 18 And after this conversation you were Ο. Sullivan and told her that he was using his authority told they no longer needed you? 19 19 20 to intimidate me and to constantly cause a stressful 20 21 work environment. And I explained to her that was 21 How do you know this conversation Ο. 22 the reason why I went out because between people 22 occurred? coming in my office to yell at me and getting a call He called me, then he told me that if I 23 24 from him every day to be yelled at over whatever the 24 wanted to collect my bonus to write a memo. He told Page 146 Page 144 1 Board told him without getting my side of the story 1 me it could be a two-liner, just write something was becoming very stressful to me and I was 2 saying that -- that you're resigning and that's the physically getting sick, like throwing up and just only way I could give you the bonus, you know, and I 4 not like feeling well at all. 4 did it because I was hoping he would pay me the bonus Ms. Cintron, where did you go to work I earned, but that never happened. 5 after you retired from the police department? 6 Ms. Cintron, my question was how do you 7 Δ What was that? know this conversation between Greg Doren and Deputy 8 Let me ask it a better way. Coulter occurred? After you retired from the police According to Jeff, my co-worker, he 9 10 department, did you get another job? spoke to Greg Doren who told him and he kind of like 10 11 told me -- he told me about it. Α. Not right away because physically I 11 12 couldn't, but once I started feeling a little bit 12 Okay. What's Jeff's last name? better I tried to obtain employment. For whatever I can't recall Jeff's last name. 13 13 14 reason I was not getting hired, I would go through 14 And where -- and Jeff -- where was Jeff 15 the whole process and then once they communicated in all of this? How does he know the conversation 16 with the department I was not getting hired and I did 16 occurred? 17 get hired by the one company. 17 He -- according to him, he spoke to 18 I worked there a few months, was doing 18 Greg Doren the night before because since he was a 19 well, even according to my supervisor there, and I 19 senior employee with the company he had to report to 20 think on a Friday or Thursday we had a -- a Zoom 20 Greg every night as to what was going on, how we were 21 meeting before we went out to our conferences and my doing in the conference. And he told me when we were 22 heading the next day to the conference again he told 22 boss at the time gave me my accolades of how well I 23 was doing, how many accounts I had secured. 23 me I spoke to Jeff last night -- I mean I spoke to And following the -- the -- when we all Greg last night and Greg mentioned that he spoke to 2.4

1	$$\operatorname{\textsc{Page}}\xspace$ your old boss. Do you know a Christine Coulter and I	1	Page 149 was an employee about whom you received a phone call
2	told him yes. He said well, you may want to talk to	2	from Daryl Clark, a police officer, a young police
3	Greg and Greg about if there's anything that you	3	officer; is that right?
4	need to tell him. I said there's nothing I need to	4	A. Yes.
5	tell him because I was completely honest with him	5	Q. Okay. What was the nature what
6	when I got the job, and that's all he said to me.	6	what did Mr. Clark say to you during the course of
7	And then like I said a few days later I was being	7	that phone call?
8	told I wasn't needed.	8	MS. ULAK: I'll object. Asked and
9	Q. Okay. Ms. Cintron, you testified	9	answered. She testified to it several times,
10	earlier about a lot of complaints that you were	10	but
11	making to Joe Sullivan regarding PAL and the way that	11	MR. GREEN: Okay, I just want to be
12	it was run, did you ever make these complaints in	12	clear on it.
13	writing anywhere?	13	MS. ULAK: Okay.
14	A. Yes. I sent him several memos,	14	BY MR. GREEN:
15	e-mails.	15	Q. What did Mr. Clark say to you during
16	Q. Okay. And were you ever disciplined	16	the course of that phone call?
17	for making these complaints?	17	A. He had called me stating that Ron
18	A. Not I never was disciplined. I was	18	Rabena was asking about called him to inquire
19	just ignored and nothing ever happened, he would	19	about the young man that he wanted transferred in the
20	always side with the Board.	20	unit and I explained to Daryl Clark that I couldn't
21	MS. ULAK: Those are all the questions	21	move him given the fact that he didn't qualify to
22	I have for you. Thank you.	22	come to the unit and he said well, I think you should
23	MR. GREEN: I have just a couple.	23	transfer him in or I'm going to start making some
24	MR. GOLDEN: Ike, just can I	24	phone calls about you and he said starting with
		-	
,	Page 148	,	Page 150
1	quick question?		Commissioner Ross
2	quick question? MR. GREEN: Oh, okay.	2	Commissioner Ross Q. Now, wait a minute. Wait a minute.
2	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let	2	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces.
2 3 4	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's	2 3 4	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena?
2 3 4 5	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker.	2 3 4 5	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the
2 3 4 5	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification	2 3 4 5	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL.
2 3 4 5 6 7	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to	2 3 4 5 6 7	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the
2 3 4 5 6 7 8	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and	2 3 4 5 6 7 8	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL?
2 3 4 5 6 7 8	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that	2 3 4 5 6 7 8	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes.
2 3 4 5 6 7 8 9	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's	2 3 4 5 6 7 8 9	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call
2 3 4 5 6 7 8 9 10	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd	2 3 4 5 6 7 8 9 10	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place?
2 3 4 5 6 7 8 9 10 11	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that?	2 3 4 5 6 7 8 9 10 11	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes.
2 3 4 5 6 7 8 9 10 11 12 13	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if	2 3 4 5 6 7 8 9 10 11 12 13	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board?
2 3 4 5 6 7 8 9 10 11 12 13 14	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it.	2 3 4 5 6 7 8 9 10 11 12 13 14	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank you. * * * * *	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer? A. He mentioned the same person he
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank you.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer? A. He mentioned the same person he mentioned the same person that he had asked me to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank you. * * * * * * CROSS-EXAMINATION * * * * * *	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer? A. He mentioned the same person he mentioned the same person that he had asked me to transfer in and the same person that worked for
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank you. * * * * * CROSS-EXAMINATION * * * * *	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer? A. He mentioned the same person he mentioned the same person that he had asked me to transfer in and the same person that worked for Captain Francis at the 17th.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank you. * * * * * CROSS-EXAMINATION * * * * * BY MR. GREEN: Q. Ms. Cintron	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer? A. He mentioned the same person he mentioned the same person that he had asked me to transfer in and the same person that worked for Captain Francis at the 17th. Q. I'm sorry, he worked for captain whom?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	quick question? MR. GREEN: Oh, okay. MR. GOLDEN: We can go off well, let me keep this on the record just because it's easier this way, quicker. I have some follow-up clarification questions. Do you want would you like to go first or would you like me to go first and then maybe you can if there's anything that follows up out of my clarification, maybe it's easier or but I defer to you on how you'd like to handle that? MR. GREEN: Let let me go first, if you don't have a problem with it. MR. GOLDEN: No, I don't. MR. GREEN: Okay. All right. Thank you. * * * * * CROSS-EXAMINATION * * * * *	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Commissioner Ross Q. Now, wait a minute. Wait a minute. Before I have to take this in pieces. Who is Ron Rabena? A. Ron Rabena is a Board member and at the time he was the VP of PAL. Q. He was the VP, he was the vice-president of PAL? A. Yes. Q. Okay. At the time that this phone call took place? A. Yes. Yes. Q. So he was on the PAL Board? A. Yes. Q. Okay, and did Mr. Ron Rabena mention the name of the employee that he wanted to be placed at PAL or to remain at PAL, the police officer? A. He mentioned the same person he mentioned the same person that he had asked me to transfer in and the same person that worked for Captain Francis at the 17th.

_			
1	Page 151 Q. Do you recall the time frame in which		Page 153 the police department.
2	he worked at the 17th, to the best of your	2	Q. Excuse me. Did Mr. Rush ever call you
3	recollection?	3	in connection with your relationship on the PAL
4	A. 2017, 2018 I believe. For sure 2017.	4	Board?
5	Q. And you don't remember the young man's	5	A. Yes.
6	name?	6	Q. Okay. Did Ms. Rush ever call you with
7	A. It's on some of the documents, but I	7	respect to any issues regarding the men on the PAL
8	can't recall it, you know, off the top of my head his	8	Board or the men affiliated with PAL organizations?
9	name.	9	A. Yes. She she arranged a meeting
10	Q. Okay. But you believe that you have	10	with me and when I went to meet her, she spoke to me
11	them in your documents somewhere, is that it?	11	about the PAL Board. Do you want me to elaborate?
12	A. Yes. Yes.	12	Q. When did she call you Ms. Cintron,
13	Q. Now, did you mention to Mr. Rabena the	13	this is a different question. When did Ms. Cintron
14	policy with respect to assigning officers to PAL	14	(sic) when did Ms. Rush call you in connection
15	units?	15	with the meeting regarding about with the PAL Board?
16	A. Yes, several times.	16	A. This was some time in 2017.
17	Q. Or PAL facilities?	17	Q. This was in 2017?
18	A. Yes.	18	A. Yes.
19	Q. Okay. And did Mr. Rabena also have a	19	Q. Okay. Did that meeting occur?
20	relationship with a company in connection with his	20	A. Yes.
21	employment?	21	Q. And where did that meeting occur?
22	A. Ron Rabena does the Hero Scholarship	22	A. She said she didn't want to meet in her
23	fundraiser. He assists in the Hero Scholarship	23	office, so she had me meet her at a restaurant near
24	fundraiser that is that was or used to be ran by	24	the University of Penn.
1	Page 152	1	Page 154 Q. And what what was discussed during
2	Q. Okay. And is Mr. Rabena affiliated		the course of that meeting?
	with Allied Universal Security?	3	A. When I first arrived I started talking
4	A. Yes, he's yes, he's the president.		about programs because I thought that's what we would
5	Q. And Daryl Clark is the I'm sorry,		discuss according to the conversation I had with her
	Daryl Clark was the City Council president, correct?		over the phone and according to what Ted Qualli had
7	A. Yes.		told me when he spoke to me that Maureen Rush wanted
8	Q. Do you know whether Mr. Clark spoke to		to meet with me.
	Deputy Commissioner Sullivan?	9	But when I went down there she began to
10	A. I don't know if he spoke to him.		talk to me about letting PAL and Ted Qualli run
11	Q. All right. Excuse me. Hold on for one		PAL, she stated I asked her who put her up to this
	second, please. All right.		to have this conversation with me and I mentioned was
13	And was there a lady on your Board		it Ron Rabena, Ted Qualli, Bernie Prazencia and she
	named Maureen on the PAL Board named Maureen Rush?		said yes, they figured that we could have a talk
15	A. Yes.		woman to woman. You need to they're concerned
16	Q. And who is Ms. Rush?		about what's going on at PAL. They do not want this
17	A. Maureen Rush is the chief director at		MOU to be implemented, and she began to tell me that
	University of Penn, I believe that's her title, in		I should let Ted run the show and she stated that I
	charge of the police department there and she's also		should just put my legs up and collect my check.
	a Board member.	20	She also mentioned let the men handle
21	Q. Did Mr. Rush was Ms. Rush ever		this and she also mentioned that it's not going to
	employed by the City of Philadelphia Police		be go well for me if I continue to fight them on
	Department?		the things that they're trying to do.
2.3		1	5
23 24	A. Yes. She retired as a lieutenant with	24	Q. Okay. Now, you testified you

1						
_	Page 155 mentioned the name Mr. Rabena, and, who okay, and	1	$$\operatorname{\textsc{Page}}\ 157$$ center so they could give some input and I was in			
2	that was another name that you mentioned.	2	charge of the programs team.			
3	A. Bernie Prazencia.	3	Q. So just so I forgive me to correct			
4	Q. Mr. Prazencia, who is Mr. Prazencia?	4	this on the record, but Chase Trimmer was a civilian			
5	A. He was vice chair of the PAL Board at	5	employee, correct?			
6	the time. He later became chair.	6	A. Yeah.			
7	Q. Did either Mr did Mr. Prazencia	7	Q. And and what was the first name of			
8	ever ask you to perform any act on behalf of someone	8	McCauley?			
9	that he recommended to you to either employ or	9	A. Nadarih.			
10	assign?	10	Q. Oh, Nadarih, and Nadarih is also a			
11	A. No.	11	civilian employee, correct?			
12		12	A. Yeah. She was she was she was			
13		13	a she would sit in the meetings as a coordinator			
14			because she was hired to be a PAL coordinator.			
15	_	15	Q. So just so I'm clear, Mr. Trimmer and			
16			Ms. McCauley were PAL employees, correct?			
17		17	A. Yes. Chase Trimmer was the			
	BY MR. GOLDEN:		supervisor was her supervisor and she sat in the			
19			meetings as a coordinator because whatever we decided			
	my questions and they mostly just try to clarify		at the meetings she would have to coordinate with the			
	some things that we've talked about today.		officers at the center.			
22		22	O. You had talked about Officer Little and			
	of PAL, was Ted Quality pardon me, Ted Qualli		2			
			some reimbursement issues, you mentioned that there			
24	already the executive director?	24	are rules governing reimbursement for officers; is			
1	Page 156	1	Page 158 that correct?			
2	Q. Do you know how long he had held	2	A. Yes.			
3	that pardon me.	3	Q. Have you ever seen those rules?			
4	Do you know how long he had been	4	A. Yes.			
5	serving as executive director?	5	Q. Okay. And what are they where			
6	A. Approximately a year and a half or so.	6	where did you see them?			
7	Q. Okay. Just so a year and a half before	7	A. That's a PAL rule and the I saw it			
8	you	8	in the handbook, employee handbook, as well as I			
9	A. From my recollection, yes.	9	discussed it with Ted Qualli and Sunny Li because			
10	Q before you became the commanding	10	they were having these issues with Officer Little.			
11	officer?	11	Q. The the handbook you mentioned, is			
12	A. Yes.	12	that a PAL employee handbook?			
13	Q. You mentioned earlier the programs	13	A. Yes.			
14	team, are there any other teams within PAL that you	14	Q. Did you have to sign an acknowledgment			
15	remember, like specific teams within the	15	for that handbook?			
16	organization?	16	A. Do I have to sign an acknowledgment?			
17	A. So they have like the fiance team which	17	Q. For that handbook.			
18	is all management. They have all the programs team,	18	A. No. No, it's just a document that they			
19	activities team, you know, event coordinators.	19	have there.			
20	Q. The programs team that you mentioned	20	Q. And just so I can clear this up in			
21	earlier, do you recall the names of the City	21	because we've covered a lot.			
Z 1						
	employees that were on the programs teams?	22	A. I also I also			
		22	A. I aiso I aiso Q. Okay, hold on. Hold on.			
9 10 11 12 13 14 15 16	A. From my recollection, yes. Q before you became the commanding officer? A. Yes. Q. You mentioned earlier the programs team, are there any other teams within PAL that you remember, like specific teams within the organization? A. So they have like the fiance team which	9 10 11 12 13 14 15 16 17	discussed it with Ted Qualli and Sunny Li bed they were having these issues with Officer Li Q. The the handbook you mention that a PAL employee handbook? A. Yes. Q. Did you have to sign an acknown for that handbook? A. Do I have to sign an acknowledge Q. For that handbook.			

1	Page 159 THE COURT REPORTER: She was cutting	1	Page 161 Which for which PAL centers did you
2	out. I just wanted to make sure I got it. Go	2	see the lease?
3	ahead, ma'am, finish.	3	A. Wissinoming because we were dealing
4	THE WITNESS: Because Ted Qualli was	4	with that situation and the 26th District PAL.
5	having these problems with the officers, I put	5	Q. And for the centers where PAL rents or
6	out a memorandum, a commander's order that	6	has a lease, does it pay rent to those building
7	they were not allowed to go in their pocket.	7	owners?
8	Basically reiterating what the PAL policy	8	A. Yes, the rent is different for every
9	stated.	9	every center according to Ted Qualli because that was
10	BY MR. GOLDEN:	10	the agreement that they came up with to get the to
11	Q. We have during the deposition you've	ΙI	get the lease on those buildings. Some were also
	referred to both police officers and civilian staff	ΙI	City owned buildings like rec centers.
	and just this helps when the lawyers are looking	13	Q. Do you know who negotiated the terms of
	at this later, you know, being consistent in the	ΙI	those leases?
	transcript, when you testify or refer to civilian	15	A. No.
		16	
	staff, you are referring to PAL employees; is that correct?	ΙI	
	A. Yeah.	ΙI	lease that you saw, did it have any provisions relating to repair and upkeep responsibilities?
18		ΙI	
19	Q. Okay. Did any of the PAL employees	19	A. Well, the 26th District was supposed to
	have the ability to set your schedule?	ΙI	be open with the funds that they received from a few
21	A. No.	ΙI	years prior and because we were getting such we
22	Q. Did any of the PAL employees have the	ΙI	were going to get such cheap rent, Ted agreed in my
	ability to discipline or reprimand you?	ΙI	presence during a meeting with the priest that some
24	A. No.	24	repairs would get done there. But when it came to
1	Page 160 Q. Okay. Ms. Cintron, when you became the	1	Page 162 opening up the center, Ted did not stated that the
2	commanding officer, do you know how many centers PAL	2	money went in an investment account and they didn't
		ΙI	budget for it.
3	was operating in the City?	3	budget for it.
3 4	A. Fifteen.	3 4	Q. Do you know who was responsible for
		4	
4 5	A. Fifteen. Q. And the Wissinoming Wissinoming	4	Q. Do you know who was responsible for setting PAL's budget?
4 5 6	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct?	4 5 6	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go
4 5 6 7	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah.	4 5 6 7	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that
4 5 6 7 8	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that	4 5 6 7 8	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they
4 5 6 7 8	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building?	4 5 6 7 8	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could
4 5 6 7 8 9	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No.	4 5 6 7 8 9	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the
4 5 6 7 8 9 10	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated,	4 5 6 7 8 9 10	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get
4 5 6 7 8 9 10 11	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen	4 5 6 7 8 9 10 11 12	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it.
4 5 6 7 8 9 10 11 12 13	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned?	4 5 6 7 8 9 10 11 12 13	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of
4 5 6 7 8 9 10 11 12 13 14	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall.	4 5 6 7 8 9 10 11 12 13 14	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we
4 5 6 7 8 9 10 11 12 13 14	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did	4 5 6 7 8 9 10 11 12 13 14 15	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board
4 5 6 7 8 9 10 11 12 13 14 15 16	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL	4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level.
4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building	4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building owners?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to set the budget, do you know?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building owners? A. Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to set the budget, do you know? A. The Board would be final approval.
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building owners? A. Yes. Q. And have you seen those leases?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to set the budget, do you know? A. The Board would be final approval. Q. Do you know you had talked earlier
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building owners? A. Yes. Q. And have you seen those leases? A. I got to see maybe one or two because	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to set the budget, do you know? A. The Board would be final approval. Q. Do you know you had talked earlier about closing the Wissinoming Center, apart from
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building owners? A. Yes. Q. And have you seen those leases?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to set the budget, do you know? A. The Board would be final approval. Q. Do you know you had talked earlier
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Fifteen. Q. And the Wissinoming Wissinoming Center, you said that was in a church, correct? A. Yeah. Q. And that was did PAL own that building? A. No. Q. Of the 15 centers that PAL operated, you testified that PAL owned the Rizzo and the Cozen Center, were there any other centers that PAL owned? A. That was it that I could recall. Q. Do you know in the centers that PAL did not own, so I'm excluding the Rizzo and the Cozen PAL Centers, did PAL have any leases with those building owners? A. Yes. Q. And have you seen those leases? A. I got to see maybe one or two because	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Do you know who was responsible for setting PAL's budget? A. We would sit down at headquarters, go over budget items, some stuff Ted would express that per the Board they were not to be touched and they were to be left alone, and the stuff that we could make decisions on we would make decisions but at the end a lot of the stuff that I recommended would get changed or Ted would change it. So what we discussed in terms of budgeting never actually went through the way that we discussed it because changes were made at the Board level. Q. So who had who had final approval to set the budget, do you know? A. The Board would be final approval. Q. Do you know you had talked earlier about closing the Wissinoming Center, apart from

1	Page 163 Q. There are couple of names that you	1	Page 165 you know how often the decision-making meetings
2	were referenced today, I just want to clear up.	2	occurred?
3	Keith Falco is that a is he a police officer?	3	A. Ted Qualli with me and Bernie Prazencia
4	A. He's a police officer that works PAL	4	with Ron Rabena once a month, sometimes twice a
5	headquarters selected by Sergeant Faust.	5	month.
6	Q. And Officer Ragucci; is that correct?	6	Q. And do you know of those how many you
7	A. Yes. Officer Ragucci is another	7	were excluded from?
8	officer that works procurement at PAL headquarters	8	A. All of them except the one when I first
9	also selected by Sergeant Faust.	9	got there.
10	Q. And Sergeant Faust is a City employee;	10	Q. And do you what what evidence do
11	is that correct?	11	you have that you should have been included in those
12	A. Yes.	12	meetings?
13	Q. And Police Officer Little, she is	13	A. When I first got there I was told I
14	a police pardon me, a City employee; is that	14	was invited to that first meeting with Bernie
15	correct?	15	Prazencia and Ted Qualli and they told me that as a
16	A. Yes.	16	commanding officer I will be at those meetings
17	Q. You had talked earlier today about both	17	because that's when all the decision making was done.
	general board meetings and decision-making meetings	18	Q. Apart from those statements, anything
	and you would attend the general board meetings. Do	19	else that relates to your ability to be in those
	you recall that?		meetings?
21	A. Yes. The general board meetings are	21	A. After that Ted started would go to
22	more for the public to to let them know what PAL	22	the meetings alone. They wouldn't notify me when the
	is doing. No decisions are made at those meetings.		meetings were taking place and Ted would come back
24	Q. Do you recall how often those meetings		with the decisions that were already made. And I
	Page 164		Page 166
	occurred, the general board meetings?	1	Q. I appreciate that go ahead.
2	A. Quarterly.	2	A. And I explained to him that it's hard
3	Q. And the decision-making meetings, do	3	for me to follow some of their requests or decisions
	you know how often they occurred?	4	because it would violate things on the police side in
5	A. Monthly.		terms of changing the officers' shifts and things
6	MR. GOLDEN: Hold on. I just		like that, that were in violation of contractual
7	dropped somebody just dropped off.	7	agreement with the FOP or policy.
8	THE COURT REPORTER: Off the record.	8	Q. Did civilian staff have the ability to
9	* * * *	9	set police officers' schedules?
10	(Whereupon a discussion was held off	10	A. No.
11	the record.)	11	Q. Okay. Did you have a job description
12	* * * *	12	that detailed what you did as the commanding officer?
13	MR. GOLDEN: So, I think Renee, can	13	A. No.
	you read the last question?	14	Q. Okay.
14	you read one rabe 4meneron.		
	MR. GREEN: Can you read that question	15	A. That's what prompted the Memorandum of
14			A. That's what prompted the Memorandum of Understanding.
14 15	MR. GREEN: Can you read that question		
14 15 16	MR. GREEN: Can you read that question and the question before that?	16 17	Understanding.
14 15 16 17	MR. GREEN: Can you read that question and the question before that?	16 17 18	Understanding. Q. Okay. When prior to yourself, I
14 15 16 17 18	MR. GREEN: Can you read that question and the question before that? THE COURT REPORTER: Sure. No problem. * * * * *	16 17 18 19	Understanding. Q. Okay. When prior to yourself, I believe it was officer Commanding Officer Eddis is
14 15 16 17 18	MR. GREEN: Can you read that question and the question before that? THE COURT REPORTER: Sure. No problem. * * * * * (Whereupon, the requested portion of	16 17 18 19	Understanding. Q. Okay. When prior to yourself, I believe it was officer Commanding Officer Eddis is who served as the commanding officer of PAL; is that
14 15 16 17 18 19 20	MR. GREEN: Can you read that question and the question before that? THE COURT REPORTER: Sure. No problem. * * * * * (Whereupon, the requested portion of the testimony was read back by the court	16 17 18 19 20	Understanding. Q. Okay. When prior to yourself, I believe it was officer Commanding Officer Eddis is who served as the commanding officer of PAL; is that correct?
14 15 16 17 18 19 20 21 22	MR. GREEN: Can you read that question and the question before that? THE COURT REPORTER: Sure. No problem. * * * * * (Whereupon, the requested portion of the testimony was read back by the court reporter.)	16 17 18 19 20 21 22	Understanding. Q. Okay. When prior to yourself, I believe it was officer Commanding Officer Eddis is who served as the commanding officer of PAL; is that correct? A. Yes.

	Page 167		Page 169
1	Q. Okay. Do you recall any documents that		officer did XYZ, you know, and but the ones that
	discussed or set your authority as the commanding		were mainly describing what my job duties would be
	officer of the PAL unit?		was Bernie Prazencia and Ron Rabena.
4	A. No, that's why we the commissioner	4	Q. And apart from
	wanted the MOU so that we can outline what each of us	5	A. And I had even had the conversation
	was supposed to be doing and how we were supposed to		with Ted Qualli.
	be working together.	7	Q. And did okay. So Ron and Bernie
8	Q. Do you know who decides which programs		told you that, anyone else told you that you would
-	are run at each PAL center?		have equal authority with Ted?
10	A. The officers, for the most part, will	10	A. He said Ted Qualli like when we would
	ask what programs will have a set of programs that		speak, he said this is what they told me when I
	they want to run at their center but everything has		before I even got there at the meeting. Then when I
	to be approved through through PAL. They'll have		got there Ted and I had several conversations and he
	their ideas, they'll submit their ideas, sometimes		said we would you know, we're supposed to work
	they're approved, sometimes they're not, depending on		together to do XYZ, to run the unit and he explained
	the budget.		that the previous commanding officer Eddis didn't
17	Q. You had talked about having equal		want to contribute to running PAL which is why they
	authority to Ted, who who told you that you would		got rid of her.
	have equal authority to Ted?	19	He referred to Eddis as lazy and didn't
20	MR. GREEN: I'm sorry, can you repeat		want to do the job. Ted Qualli said so I have to
21	that question, please?		take over some of his responsibilities, at which time
22	MR. GOLDEN: Sure.		I told Ted well, I'm here now, you can relinquish my
23	Earlier in the deposition she had		authority back to me because I will do my job.
24	talked about having equal authority, Page 168	24	Q. Are there any documents in which you're Page 170
1	Ms. Cintron had talked about having equal	1	aware that and I'm going to leave aside the
2	authority to Ted.	2	Memorandum of Understanding, so I'm asking about
3	BY MR. GOLDEN:	3	documents apart from that.
4	Q. And my question was, Ms. Cintron, who	4	So apart from the Memorandum of
5	told you that you would have equal authority with	5	Understanding, is there any document that you're
6	with Mr. Qualli?	6	aware of that states you have equal authority to Ted
7	A. When I went to the unofficial interview	7	Qualli?
8	with the PAL Board when I first started, that's what	8	A. I didn't see any document about that at
9	they explained to me as per Commissioner Ross.	9	all. I didn't see any documents about that at all,
10	Q. Who on the Board specifically do you	10	and because there started to become some conflicts
11	recall telling you that?	11	that MOU was to become that document.
12	A. At that meeting there was at least 15	12	Q. And the same same question in a
	Board members including Ron Rabena and Bernie	13	sense, apart from the MOU, are there any documents
14	Prazencia and Ted Qualli.	14	that you have seen that state that you would be
15	Q. Okay, but what I'm asking is which of	15	responsible for the budgeting at PAL?
16	those Board members told you you have would equal	16	A. No. I just answered that, no. That's
17	authority?	17	the reason why they were implementing the MOU.
18	A. I believe it was either Ron Rabena or	18	Q. Okay. So that's the same for both, the
19	Bernie Prazencia, I can't recall but they were the	19	equal authority and the budgeting, there are no
20	two main ones speaking. The rest just asked random	20	documents apart from the Memorandum of Understanding?
21	questions as to what what I would do in different	21	A. Which was supposed to be put in place
22	circumstances as it pertains to, you know, the	22	but Sullivan stopped it and the Board did not want
23	officer and discipline or they would give me like	23	it.
24	little scenarios, like what you would do if an	24	Q. Right, I hear that. But I just so

Page 171 Page 173 and -- but that would be the only document of which takeover from PAL to civilians because they would 2 you are aware that states you have equal authority to 2 implement programs and hire people to do their jobs 3 Ted or responsibility for the budget; is that and the officers didn't like that because they like working with the kids, they liked being involved with correct? 5 It would have outlined our job duties, 5 the kids, and slowly but surely they were replacing the officers with -- with civilian staff to do 6 yes. 7 Okav. So I just want to be clear certain activities that the officers actually enjoyed 8 though that that is the only document of which you doing with the kids. are aware that speaks to your job responsibilities as So it was a very condescending the commanding officer; is that correct? situation when I got there between the civilians and 10 10 11 11 the police. So we decided to have a retreat to try 12 Okay. Do you -- okay. 12 to bring them together as one unit so that nobody is arguing, nobody, you know, is fighting about petty The incident with Chase Trimmer and 13 13 Officer Klayman -- I don't need to ask that. stuff. But the officers kept complaining that the 15 You mentioned earlier a couple of 15 civilian staff, you know, would, you know, make 16 incidents where Ted had yelled at you, can you tell 16 snarky remarks at them and they were not getting 17 me what you remember about what he said to you, like along at all and we were trying to correct them. 18 what was he yelling at you or what he was saying? 18 So some of the stuff he would come in It would be about the Memorandum of and that would be about other stuff and he would be 19 19 20 Understanding. It would be about my complaints to like you need to go speak to this officer like ba, 21 Sullivan. It would be about everything that I spoke ba, ba. So it could be about anything that he would 22 about, and he would come in to my office and just 22 come in my office to yell about. have these, you know, tantrums and yell at me. And Some stuff like I would be like please 23 24 repeatedly I would tell him that I didn't disrespect slow down, let's talk about this, what's going on. Page 174 Page 172 1 him and he should not be disrespecting me. And I But even stuff like that he would come in my office mentioned that to Sullivan who did nothing about it. to yell about when he was upset. And then towards 3 I mentioned it to the Board and they did nothing the end of me being there was more so about me 4 about it. complaining about the stuff that I was complaining Is there anything specific that Ted about. So he would come in there and try to provoke 5 said that led you to believe he was being me into an argument and I would tell him -- I'd say 6 7 disrespectful? what I have to say to my boss and, you know, this is 8 Α. Yes. He would come to my office and my decision on this, you know, and they just yell at me to the point where I would have to tell didn't -- they were getting more and more agitated, 10 him you need to leave because you're not going to 10 and especially got agitated once we received notice 11 yell at me without letting me -- we should be 11 that the MOU was about to -- we were about to have 12 discussing our concerns, not arguing about it and you this meeting about the MOU which was going to be should not be coming into my office to yell at me. 13 negotiated anyway, but the MOU had just came out, so 13 Q. 14 14 Is that everything that you can recall he came in there yelling and I told Sullivan when I 15 what Ted would yell about? spoke to Bernie and -- and Bernie Prazencia and Ron 16 It would be about different issues 16 Rabena I explained to them as well the stuff that Ted 17 because before I got to PAL, there was -- the way 17 was doing. 18 that they would deal with problems, it was them Do you know who drafted the MOU? 18 19 against us, it was civilian against police. And I 19 It was drafted by the commissioner's 20 was trying to change that dynamic and we even had 20 legal advisor and the City Solicitor's office. 21 a -- you know, Ted and I spoke about it and I'm like 21 Ο. Do you know the name by any chance --22 it shouldn't be them against police -- you know, like 22 I believe the City Solicitor looked at 23 civilian against police. 23 it, made the final determination --

24

THE COURT REPORTER: I'm sorry, who

The police were viewing it as a hostile

2.4

1	Page 175 made the final determination?	1	Page 177 CERTIFICATION
2	THE WITNESS: I believe the last person	2	
3	to review it was the City Solicitor's office	3	
4	before it came back to Commissioner Ross.	4	I hereby certify that the proceedings and
5	BY MR. GOLDEN:	5	evidence noted are contained fully and accurately in
6	Q. Do you know by any chance by name who	6	the stenographic notes taken by me upon the foregoing
7	drafted either one of those and who drafted in those	7	matter dated2023, and that this is a
8	offices?	8	correct transcript of the same.
9	A. I know from the from the person	9	
10	the captain that was assigned to draft it from Ross	10	
11	was the legal advisor Fran Healy.	11	
12	Q. And just so I can close the loop on	12	DENDE CCHIMANN
13	this, Ms. Cintron, is that everything you recall	13	RENEE SCHUMANN CERTIFIED COURT REPORTER
14	about the incidents where Ted would yell at you?	14	LICENSE NUMBER: 30XT00005200
15	A. Yes.	15	
16	MR. GOLDEN: Thank you, Ms. Cintron.	16	(The foregoing certification of this
17	That is all the questions I have.	17	transcript does not apply to any reproduction of the
18	THE WITNESS: Okay. Thank you.	18	same by any means, unless under the direct control
19	MS. ULAK: I don't have any more	19	and/or supervision of the certifying reporter.)
20	questions.	20	
21	MR. GOLDEN: Ike, can we break?	21	
22	MR. GREEN: Yes.	22	
23	THE VIDEOTAPE OPERATOR: The time is	23	
24	3:57 p.m., we are off the record.	24	
1	Page 176		
2	(This concludes the deposition of		
3	Evelyn Cintron at 3:57 p.m.)		
4	* * * *		
5	MR. GOLDEN: I would like a copy. Can		
6	you e-mail that?		
7	THE COURT REPORTER: Sure. Normal		
8	delivery everyone?		
9	MS. ULAK: That's fine.		
10	MR. GOLDEN: Yes.		
11	MR. GREEN: We'd like to read and sign.		
12	THE VIDEOTAPE OPERATOR: I just need to		
13	know who will be ordering the video.		
14	MR. GOLDEN: This is Kevin Golden for		
15	PAL, I don't believe we'll be ordering this		
16	one at this time.		
17	MR. GREEN: Not at this time. We may		
18	later. We just need the transcript right now.		
19	MS. ULAK: Yeah, I think I guess		
20	I'll take the video. I did order it.		
21	* * * *		
22	(Whereupon, Exhibit City-1, City-2,		
23	City-3 and City-4 were marked for		
24	identification.)		

WORD	151: <i>4</i> 153: <i>16</i> ,	112:2, 5	advisor 56:5,	amount 12:23	approximately
INDEX	17	121:2 <i>3</i> 129: <i>11</i>	12 62:24	13:5 39: <i>17</i>	4:10 10:5, 14
	2018 9:22, 24	absolutely 64:9	174:20 175: <i>11</i>	69:17	78:17 80:14
<\$>	63:23 64:23	abused 78:13	advocating	analysis 68:22	81:23 156:6
\$25 47:14, 15,	97:9 151:4	abusing 32:18	109:16	and/or 177:19	Arch 2:1
16	2022 5:20	accolades	Affairs 51:4,	announced	area 38:24
10	7:24	144:22	20 89:6 93:23	109: <i>19</i>	40:17 121:8
<1>	2023 1:1 4:9	accomplish	104:20 105:10,		areas 118:24
10 38:16	177:7	55:5	· ·	anonymous 90: <i>16</i> 104: <i>17</i>	119:1
			15, 24 106:8,		
128:2, 15	215 2:1	accomplished	13 107:4, 6, 22	answer 6:9, 16,	argue 112:10
10:13 1:1 4:10	239 86:1, 3	18:11	110:21 111:19	21 7:2, 3, 9	argued 66:3
10:49 30: <i>10</i>	242 86: <i>1</i>	account 48:1,	114: <i>13</i> 115:2,	24:10 30:24	arguing 63:18
10:50 30:20	25th 15:20, 23	10 162:2	13 116:8, 12	82:11 100:7,	65:7, 9 66:4
100 119:9, 10	16: <i>10</i> , <i>14</i> , <i>15</i>	accounts	122:2 126:2	<i>17</i> 108: <i>16</i> , <i>21</i> ,	172: <i>12</i> 173: <i>13</i>
11/6/17 129: <i>18</i>	70:1, 10	144:23	130:20 131:2	22 112: <i>1</i>	argument
11:39 64: <i>11</i>	26th 142:6, 9	accurate 7:4	134:7, 18, 24	139: <i>16</i> , <i>17</i>	93:14, 24
11:54 64: <i>16</i>	161: <i>4</i> , <i>19</i>	113:8 116:20	137:20, 2 <i>1</i>	143:3	113:6 174:6
11:58 67: <i>18</i>	27 97:4	131:3	affiliated	answered	arranged
12 127: <i>18</i>	130:24	accurately	152:2 153:8	24: <i>11</i> 149:9	153:9
12:07 68: <i>12</i>	28th 5:20	177:5	afraid 115:6	170: <i>16</i>	arrival 117:22
12:56 104:5	7:24 88:21	acknowledged	afternoon	answering	arrived 13:17
13 23:6 97:6		125:22	70:13 71:16	66:10 113:13	19:19 20:16
14 1: <i>1</i> 4:9	<3>	acknowledgmen	afternoons	anxiety 139:4	55:6 69:20
39:23	3:57 175:24	t 158:14, 16	71:4	anybody 7:17	130:17 154:3
148 3:8	176:3	act 103:10	agenda 112: <i>17</i>	14:18 19:11	arriving 102:2
15 160: <i>11</i>	30 130: <i>11</i>	155:8	agitated 174:9,	36:6 41:4, 17	ashamed 27:7
168:12	30XT00005200	acting 51:11	10	125:12 132:2	Aside 36:21
1515 2: <i>1</i>	177:13	86:24	ago 9:5 51:2	133:23	170:1
1513 2.1 152 111:21	3600 2:1	action 44:18,	agree 79:16	anyway 61:5	asked 7:9
155 3:9	3000 2.1	19, 22 45:3	81:24 86:11	120:1 174:13	16:19 22:23
		T			
15th 2:1	<5>	101:14 124:21	106:3 130:15	apart 162:21	26:11 30:7
1650 1:1 2:1	5 3:7	actions 45:16	agreed 25:17,	165:18 169:4	45:2, 9 74:15
16th 111:21	50 119:8, <i>11</i>	active 22:18	21, 23 79:14	170:3, 4, 13, 20	76:13 84:14
17 10:2	54 90:7, 10	23:5, 6 120:7	161:22	apologize 8:18	99:15 108:6, 7
176 3:15, 16,	550-1999 2: <i>1</i>	121:2	agreement	85:16	117:17 124:1
17, 18	569-2100 2: <i>1</i>	activities	48: <i>11</i> 130: <i>13</i>	apparently	139:20 149:8
17th 73:16, 17		156: <i>19</i> 173: <i>7</i>	161: <i>10</i> 166: <i>7</i>	56:14	150: <i>19</i> 154: <i>11</i>
74:9, <i>15</i>	<6>	actual 33:14	agreements	applied 145:7	168:20
150:2 <i>1</i> , 2 <i>3</i> , 2 <i>4</i>	6 57:7	add 111:24	51: <i>1</i>	apply 177:17	asking 61:2 <i>1</i>
151:2	683-5083 2: <i>1</i>	address 27:9	ahead 108: <i>17</i> ,	appointed	72:18 74:20
19102 2: <i>1</i>		123:7 124: <i>1</i> ,	22 128:7	15:7 17: <i>4</i>	81:12, 13
19103 2: <i>1</i>	<7>	<i>15</i> , <i>21</i> 125:7	159: <i>3</i> 166: <i>1</i>	19: <i>14</i> 50: <i>17</i>	93:18 121:11
19-CV-4078	700 2:1	addressed	Allied 152: <i>3</i>	62:5	136:22 149: <i>18</i>
1:1 4:8	75 3:18	111:2 <i>4</i> 115: <i>1</i>	allocate 13:5	appreciate	168: <i>15</i> 170:2
		125: <i>14</i> 129: <i>10</i>	61: <i>17</i>	24:10 166:1	assign 43:20
<2>	< A >	131: <i>11</i>	allocated 14:5	approached	44:2 69:11
2 2:1	a.m 1:1 4:10	adjust 130:10	allocating 13:3	55:9 99:15	155:10
2:11 104: <i>11</i>	30:10, 20	administrative	allow 40:18	approval	assigned 12:12
2:12 105: <i>1</i>	64:11, 16	12:13 15:21	48:22	118:3 162:17,	22:6 43:6, 10
2:12 105:7	67:18 105:7	68:20 70:22	allowed 40:5,	19	44:4 74:16, 22
20 3:18 15:15	ABC 57:7	127:19	17 41:12, 14	approve 12:22	102:20 103:16
44:7	ability 101:11	advantage	48:11 118:6	74:20 116:3	141:22 145:2
2017 44:7	159:20, 23	117: <i>16</i>	120:24 127:19	approved	175:10
63:3 64:24	165: <i>19</i> 166:8	advertising	159:7	118:5 119:11	assigning
97:4, 6, 9, 10	able 6:9	40:23	allowing 56:9	167:13, 15	151:14
98: <i>19</i> 129:2 <i>1</i>	40:14 70:16	advice 51:23	amended	approving	assignment
130:16, 24	71:7, 9 84:10	advised 25:16	89:21 90:4	61:22 116:2	99:5
139:9 140:12	85:17 90:20	134:8		approximate	assignments
	I	I	I	10:4	I

70: <i>18</i> 132: <i>15</i>	170:6, 19	basketball	bimonthly	brief 64:13	called 26:14			
assist 12:13	170.0, 19	40: <i>14</i> , <i>15</i> 41: <i>6</i> ,	17:20	68:9	27:5 43:22, 23			
assistant	available 87:7	9	bingo 32:14,	briefly 138:9	47:24 48:3			
66:24 67:5, 7	avoid 82:8	baskets 43:17,	15, 17	bring 72:12	51:8 52:6			
68:21 69:24	85:2	18	bit 5:24 7:14	78:5 90:6	56:1, 3 57:16,			
70:22 71:12	aware 14:24	Bates 85:24	15:17 19:18	91:21 173:12	21 62:22 66:5,			
assisting 71:4	36:10 66:18	111:2 <i>1</i>	21:8, 10 29:8	bringing	7 74:10, 15, 22			
assists 151:23	131:21 170:1,	bear 9:2	32:6 38:7	22:20 54:20	77:4,679:13			
association	6 171:2, 9	becoming	39:13 78:2		91:4 99:17			
4:14	0 171.2, 9	77:20 118: <i>15</i>		brought 5:17 9:11 28:12	112:23 113:16			
	< B >		83:18 88:9, 10					
assume 7:2		125:5 144:2	95: <i>13</i> 104: <i>16</i> 120: <i>3</i> 122: <i>24</i>	35:19 55:8, 15	116:1 123:11,			
assuming	ba 173:20, 21 back 6:12	began 5:21 21:23 54:14	134:17 144:12	69:21, 22 94:4	16 125:10			
116: <i>16</i> asthma 22: <i>19</i>	19:13 22:4			119:6 123: <i>19</i> buddy 52: <i>3</i>	136:19, 23, 24			
		63: <i>13</i> 154:9,	black 141:3	98: <i>13</i>	137:16 143:2,			
Athletic 2:1	26:9 30:2, 4,	- '	blackballed		17 145:13, 23			
4:24 9:14, 20	16, 20 31:3, 8 32:4 33:13, 23	beginning 9:6, 22 88:18	76:21	budget 11:19,	149:17, 18			
11:1, 9 12:7	44:12 47:21		blatantly 45:6,	21 12:1, 22, 24	calling 66: <i>14</i> 98: <i>7</i> 99: <i>6</i>			
13:12 36:19	48:17 52:2	95:18, 20 97:6	18 98:11 125:2	13:3 14:10, 14,				
129: <i>11</i>		begins 4:2		17 15:1 16:2,	100:21 134:11			
attached 3:18	54:18 55:20	behalf 4:19,	Board 11:20	6, 24 18:22, 24	calls 66:10			
attempt 112:9,	58:18 64:16	21 107:23	17:13 18:1, 3,	31:11, 13	76:18 87:1			
14	68:12, 17 75:5	155:8	9 19:2, 5 27:6,	38:11 61:17,	113:13 132:17			
attempted	84:2 85:8, 9	believe 9:22	15 33:13 34:4	18 119:7	149:24			
26:4 132:4	88:9, <i>17</i> 91:2 <i>1</i>	20:22 27:22	36:6 41:18	162:3, 5, 7, 18	Campbell			
attempting	100:13, 24	35:10 39:9	42:7 45:23	167:16 171:3	140:23 142:5			
21:5	101:10 103:21	52:24 56:24	49:24 51:11	budgeting	cancel 35:4			
attend 23:9	104:11, 13	121:10 136:14	54:15 55:16	11:17 12:2	cancelled			
96:13 163:19	105:7 127:22	139:9 141:9	62:14 132:17	162: <i>14</i> 170: <i>15</i> , <i>19</i>	34:21			
attending 23:6	128:14 132:8,	151:4, 10	133:20 144:1		cancer 138:12,			
attention	23 133:12	152:18 166:18	147:20 150:5,	building 20:23	13, 16			
35: <i>19</i> 55: <i>8</i> , <i>16</i>	134:16 139:19,	168: <i>18</i> 172: <i>6</i> 174:22 175:2	13 152:13, 14,	23:20 28:18,	capital 61:23			
86:2 89:17	24 145:1		20 153:4, 8, 11,	21, 22, 24 29:3	Captain 74:7,			
91:21 94:4	164:20 165:23	176:15	15 155:5	33:7, 8, 9, 12,	8, 17, 22 75:9,			
96: <i>16</i> 105: <i>13</i>	169:23 175:4	belonged 33:9 39: <i>3</i>	162:8, 15, 19,	19 35:3, 5, 8,	12 76:10, 16			
119:7 123:20 125: <i>1</i> 9	background 75:1	benefit 31: <i>15</i>	24 163:18, 19, 21 164:1	11, 12, 13, 14, 16 38:9 39:2	140:16 141:8			
attorney 29:16	backlog 19:24	32:19, 20	168:8, 10, 13,	61:23 102:8,	142: <i>16</i> 150:2 <i>1</i> , 22 175: <i>10</i>			
106:22 107: <i>1</i> ,	29:14 31:7	benefiting 33:1	16 170:22	10 103:17, 18	care 125:15, 16			
	38:20	benefits 32:20	172:3		carries 66:16			
2, 12, 14, 15, 18 110:16 137:23	bad 38:20	berate 112:13	bonus 145:24	160:9, <i>17</i> 161:6	carry 13:19			
attorney's	128: <i>19</i> 145:8,	Bernie 17:9,	146:3, 4	buildings 33:3	14:6 45:6			
107:8	9	15 52:13 56:4	booked 126:20	35:12 36:11	carrying 75:6			
audio 141: <i>15</i>	based 12:8	57:5, 7, 9	borrow 39:5	161:11, 12	85:2 103:7			
audit 14:9	18:17	62:22 63:7	boss 144:22	bully 115:7	Case 4:8			
16: <i>13</i> , <i>19</i>	Basically	78: <i>12</i> 154: <i>13</i>	145:3 147:1	bureau 53:2	36:14 115:4, 8			
auditing 16:8,	11: <i>14</i> 14: <i>4</i>	155:3 165:3,	174:7	buy 32:10, 11	135:3			
10, 24	40:11 44:8, 15	14 168:13, 19	bothered 57:20	117:18	cash 118:8			
August 119:16	45:17 55:17,	169:3, 7	bothering	buying 32:13	Cassandra			
authority	18 65:9 66:16	174:15	54:19	buying 52.15	65:13, 18, 20			
23:24 24:12	74:20 75:5	best 6:16, 20	bottom 88:1	< C >	121:5			
25:3, 6, 8	80:2 120:13	55:3 151:2	111:5 125:20	call 42:18, 22	caught 21:11			
36: <i>16</i> 60: <i>4</i> , <i>16</i>	126:12 133:10,	better 33:3	brag 98:12	66:12 74:6	96:5, 15			
61:5, 8 62:10,	21 134:1	51:9 68:6	bragging 96:17	76:10, 12, 13	cause 101:1			
13, 15 74:2	143:4 159:8	79:10 120:3	brand 38:12	79:10 123:13	125:4 143:20			
77:3 78:13	basis 33:10	133:14 143:10	break 7:7, 8,	124:7 128:23	caused 35:5			
143:19 162:22	69:7, 10, 17	144:8, 13	10 64:1, 5, 19,	143:3, 9, 16, 17,	causing 44:14			
167:2, 18, 19,	70:17 97:23	beyond 74:4	20 175:21	23 149:1, 7, 16	cell 16:22			
24 168:2, 5, 17	98:1	big 39:16	Brent 110:22	150:10 153:2,	83: <i>13</i> , <i>16</i>			
169:9, 23	70.1	bigger 126:22	115:1 134:23	6, 12, 14	05.15, 10			
	-		110.1 101.20		-			

84:16, 20, 21	changed 11: <i>19</i>	85:17 87:14,	157: <i>4</i> , <i>11</i>	come 18:16,	Commissioner
86:21, 23	162: <i>12</i>	20 90:1 95:22	159:12, 15	21 26:15 34:8	10:12, 13, 15,
center 12:15	changes 162:15	100:17 101:15	166:8 172:19,	52:2 70:3, 7	18 17:9 24:2
20:7, 13, 19, 21	changing	104:13 108:18	23 173:6, 15	73:24 79:9	25:13, 15, 21,
21:5, 24 22:1,	48: <i>14</i> 130: <i>12</i>	110:6, 13	civilians 60:18,	99:3, 6 100:21	23.13, 13, 21, 23 27:3 36:9,
6, 8, 9, 15, 18,	166:5	120:2 121:20	24 121:7	102:6 104:19	21 37:1, 3, 12
	charge 13:9,	120.2 121.20	127:1 173:1,	102.0 104.19	49:7 50:16
21, 22 23:2, 5,			10		
7, 11, 21, 23	24 15:22 43:4	135:22 138:7		123:11 149:22	51:9, 10, 18
24:13, 20 25:6,	44:2 53:4, 16	140:13 142:10	clarification	156:24 165:23	52:7, 8, 19, 20,
12, 22, 24 26:4,	54:5 60:14	144:5 146:6	148:6, 10	171:22 172:8	21, 23 53:10,
6, 9, 11, 12, 17,	61:3 116:12	147:9 148:22	clarify 6:20	173:18, 22	13, 14, 24 54:4
21 27:2, 11, 18	128:2 152: <i>19</i>	153:12, 13	155:20	174:1,5	55:24 56:3, 5,
28:8 29:1, 6	157:2	155:19 160:1	clarifying	comfort 64:1, 5	7 58:1 62:15,
39:4, 22 40:9,	Chase 63:21	164:2 <i>4</i> 168: <i>1</i> ,	87:11	coming 18:13	20 63:5 76:19,
18 74:16, 17	65:6 97:8	4 175:13, 16	clarity 11:6	23:9, 10 28:14,	24 77:5 78:4,
75:7 142:6, 8,	106:4 112:16	176:3	Clark 76:11	15 101:10	<i>19</i> 79: <i>13</i> 81: <i>4</i>
9 157:1, 21	120:6 121:4	circumstances	77:6 79:13	114:20 123:24	115: <i>15</i> 116: <i>1</i> ,
160: <i>6</i> , <i>13</i>	123:4, 5, 10	168:22	149:2, 6, 15, 20	130:5 133:6	4, 11 140:19
161:9 162: <i>1</i> ,	156:23 157:4,	circumvent	152:5, 6, 8	138:9 143:23	141:7, 10, 12,
21, 23 167:9,	<i>17</i> 171: <i>13</i>	133:15	classroom	145:5 172:13	16, 23 142:5
12	chat 6:11	CITY 1:1 2:1	22:9 23:13, 15	command	145: <i>4</i> 150: <i>1</i>
centers 12: <i>13</i>	cheap 161:22	4:6, 19 5:16	clean 26:10	15:20 20:11	152:9 167:4
19:20, 22 20: <i>1</i> ,	cheaper 32:11,	9:12 12:9	clear 8:8 10:4	42:6, 8 53:15	168:9 175: <i>4</i>
2, 5, 6 26:23	17	29:2 36:23	28:3 29:2	98: <i>3</i> 99: <i>16</i>	commissioners
31:9, 17 33:15	check 69: <i>16</i>	45:22 48: <i>4</i> , <i>5</i>	36:18 37:21	100:1, 5, 19	10:8
36:24 37:17	75: <i>1</i> 118:8	56:23 60:7, 21	40:19 50:7	101:6 125:3	commissioner's
38: <i>3</i> , <i>4</i> , <i>8</i> , <i>21</i>	154: <i>19</i>	69:3 83:13, 16	51:20 60:6	132: <i>13</i>	174: <i>19</i>
39:4, 5, 6, 7, 16,	checked	84:9, 16, 22	62:16 75:13	commander	common 36:2
<i>19</i> , <i>24</i> 40: <i>1</i> , <i>2</i> ,	138: <i>16</i>	85: <i>3</i> 86: <i>16</i> , 2 <i>1</i>	78:15 83:2	14:8 15:10	
18 70:20	checking 128:5	107:2 111:2 <i>1</i>	91:7 95: <i>1</i>	51:22	Commonwealth
75:15 109:16	chief 15:5	128:9, <i>21</i>	96:21 97:5	commander's	1: <i>1</i>
128:6 160:2,	118:7 152: <i>17</i>	132:2 134:5,	116:7 121: <i>13</i>	12:24 159:6	communicated
11, 13, 15, 17,	children 12: <i>15</i>	<i>14</i> 135: <i>10</i> , <i>23</i>	122:13 124:22	commanding	144: <i>15</i>
<i>23</i> 161: <i>1</i> , <i>5</i> , <i>12</i>	23:19 25:9	136: <i>3</i> , <i>14</i>	141:2 <i>4</i> 149: <i>1</i> 2	9:14, 20 10:6,	communicating
certain 12:23	chime 8:18	137: <i>11</i> 139: <i>3</i>	157:15 158:20	9, 22, 23 12:20	95:9
13:5 14: <i>1</i> , 2	choice 20:12	145:8 152:6,	163:2 171:7	15:7, 13, 19, 24	communication
48:6 113:15	24:22 70:2, 3,	22 156:2 <i>1</i>	clearly 115:7	16: <i>3</i> , <i>8</i> 17: <i>1</i> , <i>4</i> ,	113:7
173:7	4 86:24	160: <i>3</i> 161: <i>12</i>	close 20:12, 14,	12 19:15, 16	community
certification	124: <i>16</i>	163: <i>10</i> , <i>14</i>	19 23:2, 21, 23	20:18 23:24	24:19 27:12
16: <i>18</i> , <i>23</i>	choose 35:4	174:20, 22	24:3 25:6	24:12 25:7	43:15, 17 73:7
177: <i>16</i>	chose 129:22	175: <i>3</i>	26:17 34:11	29:9 41:23	142:7
CERTIFIED	Christine	City-1 3:15	70:9 115:4, 8	42:9 50:17	community-
177: <i>13</i>	147: <i>1</i>	85: <i>13</i> , <i>23</i>	135:2 162:22	55:18 56:17	oriented 73:8
certify 177:4	Christmas	176:22	175:12	59:18 62:6, 7	company
certifying	39: <i>15</i> 43: <i>14</i>	City-2 3:16	closed 22:1	78:9, 18 83:12	144: <i>17</i> 146: <i>19</i>
177:19	Christopher's	110:7 111:22	25:10, 12	94:24 125:2	151:20
chain 98:3	70:9	176:22	119: <i>16</i>	129: <i>10</i> 140: <i>14</i>	compel 49:24
99:16 100:1, 5,	church 28:18,	City-3 3:17	closet 22:10	141:6, <i>17</i>	50:4
19	20, 22, 24	121: <i>19</i> 122: <i>1</i>	closing 26:23	142:3, 12	complain
chair 155:5, 6	160:6	176:23	162:2 <i>1</i>	155:22 156:10	132: <i>11</i>
challenge 8:19	CINTRON	City-4 3:18	coach 40:10,	160:2 165: <i>16</i>	complained
chance 8:3	1:1 3:4 4:4, 5,	129:6 176:23	22	166:12, 18, 19	42: <i>17</i> 55: <i>1</i>
90:12 111:13	22 5:5, 15	City's 136:15	cocky 98:10	167:2 169: <i>16</i>	127:23 131:24
122:20 174:2 <i>1</i>	9:11 30:23	civilian 50:9,	collect 145:24	171: <i>10</i>	complaining
175:6	31:24 32:21	10 57:4 60:2,	154:19	commencing	22:19 133:8,
change 11:20	33:22 35:8	3, 6 63:11	college 72:10	1: <i>1</i>	16 134:10
70:14 127:23	46:24 58:16	71:20 72:4	combine 39: <i>16</i>	comment	135:19 173:14
162:12 172:20	61:21 64:18	93:15, 24 94:3	combined	50:20 126:18,	174:4
1, 3	67:23 73:9	98:17 101:23	39:24	19	
				-	

complaint	conference	Conway	31:3 64:7	date 1:1 4:9	defendants 4:6
41: <i>3</i> 89:22	132: <i>17</i> 145: <i>3</i> ,	106:19, 21	68:17 100:13	10:2 79:1, 4	defer 148:11
90:5, 7, 21	4 146:21, 22	110:22 114:1	139:21, 24	80:12 81:11,	definitely 53:4
95:7 134:7, 8,	conferences	115:2, 3	140:4, 20	12 96:22 97:3	Delaware
	144:2 <i>1</i> 145: <i>1</i>	· · · · · · · · · · · · · · · · · · ·	159:1 164:8,	105:22 129:3,	40: <i>17</i>
15 135:10, 23		134:22, 23	1	· ·	
136:2, 5, 8, 9,	conflict 52:14	coordinate	17, 20 174:24	4, 17 130:18	delivery 176:8
13 137:8, 15	132:18	13:18 47:7	176:7 177:13	131:13	denied 116:4
138: <i>1</i>	conflicts	67:9 157:20	courtesy 124:2,	dated 130:24	119:10 125:21
complaints	170:10	coordinator	12	177:7	DEPARTMEN
29:10, 13	confront	157:13, 14, 19	covered 158:21	dates 80:11	T 2:1 9:15
32:22 33:17,	126:15	coordinators	co-worker	David 66:23	12:4, 17 36:3
24 34:2, 6	confusing 53:2	156:19	145:2 146:9	day 7:24 8:11	46:16 50:8
36:5, <i>6</i> , 22	connection	copy 22:23	Cozen 39:10,	20:6 22:5	55:3 56:9, 11
37:2 41: <i>16</i>	32:6 151:20	176:5	11 160:12, 16	45:22 58:9	59:2, 9 72:8
42:2, 12 132:1,	153:3, 14	correct 16:12,	crazy 35:3	66:20 75:8	104:17 115:16
2 137:10	connectivity	20 17:7 26:3	create 112:9	113:1 128:18	135:15 136:9,
147:10, 12, 17	83:16	37:23 42:9	113:2 114:7	143:24 146:22	10, 15 144:6,
171:20	consider 58:14	48:9 49:9	created 113:19	days 22:5	10, 16 152:19,
complete 6:10	77:18 80:4	51:21 59:2	creating 98:8	48:12 55:7	23 153: <i>1</i>
56:10 58:24	considered	60:10 65:1	crime 67:8	130:11 147:7	Departmental
completely	48:13	75:16 78:19	68:22	day-to-day	49:13, 15, 21,
147:5	consistent	79:15 106:5,	criteria 73:22	11:2, 10 12:14	23 50:1, 5, 11,
complies 86:6	159:14	20 107:23	74: <i>4</i>	DC 48:2	24 134:2
90:14	constant 37:14	124:11 129:23	CROSS-	deal 66:6	135:24 136:3
complying	constantly	152:6 157:3, 5,	EXAMINATIO	172:18	depending
50:24 51:12	143:20	11, 16 158:1	N 3:8, 9	dealing 74:24	17:23 167:15
computer	consult 14:20	159:17 160:6	148:19 155:16	91:1 161:3	depends 70:24
63:14, 19	consulting 26:6	163:6, 11, 15	crosstalk	decided 19:19	71:5, 17
64:22 65:10	contact 99:4, 5	166:20 171:4,	113:9 136:7	27:10 38:17	deplorable
concern 35:1	133:23 138:6	10 173:17	current	118:22 119:12	20:8 31:8
48:16 54:20	contacted	177:8	135:13 140:18	120:1 134:13	37:24 39:6
concerned	25:13	corrected	currently	157:19 173:11	deposition 1:1
31:7 38:14	contained	31:16	138:17 142:2	decides 167:8	4:4 5:18, 19,
55:22 115: <i>1</i> , <i>3</i>	22:13 90:17	correctly 9:17	custodian	decision 20:11,	21 9:5 87:16
117:3 154:15	177:5	25:12 27:18	27:17	12 23:21, 22	88:21 89:1, 4,
concerns 9:13	continuation	50:3 79:12	cut 8:23 21:8,	24:1, 3, 22	18 90:6
36:10, 12, 24	9:4	81:5 86:18	10 31:24	25:21 26:5, 17	138:10 159:11
	continue 5:18	99:9 117: <i>10</i>	35:17 48:18	55:13, 19	167:23 176:2
54:20 108:9,	71:20 73:18	Coulter 116:2,	50:2 79:7	59:17 61:7, 8	depressed
15 125:13	95:16 142:18	4 145:4, 16	134:1	78:14 83:3	140:6
131:11 133:20	154:22	146:8 147: <i>1</i>	cutting 21:18	131:16 165:17	depression 139:5
134:5 172:12	continued	Council 76:10	43:1 159:1	174:8	
concludes 176:2	112:9	79: <i>12</i> 152:6 counsel 4: <i>16</i>	< D >	decision- making 18:7,	deputies 115:6 deputy 10:8,
condensation	contractual 48:11 51:1	5:9 8:17	Dahl 142:7	15 163:18	
22: <i>11</i>	130:13 166:6	107:22 137:9	Dani 142:7	164:3 165: <i>1</i>	11, 13, 15, 17 24:2 25:13, 15,
condescending	contribute	counseled	140:23	164:3 165:1	24:2 25:13, 13, 20, 23 27:2
98: <i>10</i> 173:9	169: <i>17</i>	119:3	Dahl-Campbell	decisions 18:8,	36:8, 21 37:1,
conditions	control 177:18	counseling	140:19, 22	14 20:10 59:4,	3, 4, 11 51:10,
20:8, 13 22:8,	conversation	51:6	140.19, 22	6, 7, 23, 24	18 52:7, 8, 19,
15, 24 23:10	6:7 97:2 <i>1</i>	couple 55:7	141.2, 3, 21	109:17 113:17	20, 21, 23
27:12 31:9, 17	101:20 103:13	147:23 163:1	dance 119:6	162:10 163:23	53:10, 12, 14,
33:3, 16 37:24	133:21 145:16,	171:15	Danielle	165:24 166:3	24 54:4 55:23,
38:21 39:6	18, 21 146:7,	course 88:4	110: <i>16</i>	declined 79:20	24 56:5 66:12
138:18 139:12	15 154:5, 12	149:6, 16	Daryl 35:24	117:24 118:17	78:3, 18 81:3
conducive	169:5	154:2	76:11 149:2,	117:24 118:17	96:15 98:16
31: <i>12</i> 56: <i>11</i>	conversations	COURT 1:1	20 152:5, 6	Defendant 1:1	
			1	2:1 4:24	99:2, 10, 11, 14,
59: <i>1</i> conduct 16: <i>13</i>	52:13 169:13	4:7, 13 5:2 6:3 30:8, 16	data 67:8 68:22	2.1 4:24	17, 21 100:21, 22 101:3, 4, 17
	1	0.5 50.0, 10	1 00.22	1	1 22 101.3, 4, 1/

5

115:15 116:1, disappear 124:10 125:3 downward 16, 19, 20, 21 errands 67:9 error 8:21 especially 8:22 172:1 distance 103:5 distance 103:1 distance 103:5 distance 103:1 distance 103:5 distance 10						
6 153:6 disciplinary disrespecting 140:18 141:2, 7,10,12,16,23 101:13 124:21 distance 103:5 discipline 143:3,16 159:23 168:23 disciplined 144:3,16 159:29 disciplined 264:4,12 69:15 175:7 drive 112:17 176:6 essence 59:17 176:6 essence 19:17 176:6 essence 19:17 176:6 essence 59:17 176:6 essence 19:17 176:6 esse	115: <i>15</i> 116: <i>1</i> ,	disappear	124:10 125:3	downward	16, 19, 20, 21	errands 67:9
140:18 141:2,	<i>4</i> , <i>11</i> , <i>23</i> 132:5,	45:21 46:6, 7	172:7	60:15	35:4	error 8:21
The property is a composite of the property is a composite o	6 135:6	disciplinary	disrespecting	draft 56:13	E-mail 3:15,	especially 8:22
7, 10, 12, 16, 23 101:/3 124:21 distance 103:5 distributed 142:4, 21 145:3, 16 159:23 168:23 46:4, 12 69:15 175:7 175:6 123:2 124:17 101:/6 essence 59:17 98:8 101:2 60:17 100:3, 4, 24 45:20 72:4, 5 17:47, 8 17:50 139:4 60:20 147:16, 18 147:16, 18 147:16, 18 147:16 159:23 168:23 147:16, 18 147:16 159:23 168:11 166:11 166:11 166:11 166:11 166:11 166:11 166:11 166:11 166:11 166:12 164:11 166:12 164:11 166:12 164:11 166:12 164:11 166:13 17:42 17:43	140:18 141:2,	44:18, 22 45:3	172: <i>1</i>	57:1 175:10	17 86:5, 10, 11,	9:6 174:10
145:3, 16 159:23 168:23 46:4, 12 69:15 175:7 drive 112:17 176:6 e-mails 147:15 e-mells 147:15 155:21 155:21 151:21 e-mells 147:15 e-mells 147:15 e-mells 147:15 e-mells 147:15 e-mells 147:15 e-mells 147:15 155:21 155:21 153:21 1	7, 10, 12, 16, 23	101: <i>13</i> 124:2 <i>1</i>	distance 103:5	drafted		ESQUIRE 2:1
145:3, 16 159:23 168:23 46:4, 12 69:15 175:7 176:6 29:17 100:3, 4, 24 45:20 72:4, 5 15:21 16:11, 16:19 147:16, 18 14, 15 70:1, 10 139:4 25:20 126:7 25	142: <i>4</i> , <i>21</i>	discipline	distributed	174:18, 19	123:2 124: <i>17</i>	110: <i>16</i>
deputy's 99:19 disciplined deputy's 99:19 29:5 42:11 DISTRICT DISTRICT dropped 29:17 c-mails 147:15 essentially essentially essentially emergency 71:13 establish 48:10 employed 60:7 35:2 establish 48:10 EVELYN 1:1 47:8 discovery 73:17 74:9, 15 duly 5:5 dulties 10:21 discovery 73:17 74:9, 15 duly 5:5 dulties 10:21 discovery 73:17 74:9, 15 duly 5:5 dulties 10:21 dulties 10:22 dulties 10:21 dulties 1		159:23 168:23	46:4, 12 69:15		125:20 126:7	essence 59:17
deputy's 99:19	•					
100.3, 4, 24 48:20 72:4, 5 15:21 16:11,		_				
describing 169:2		45:20 72:4, 5				
169:2			· '	due 133:16		establish 48:10
DESCRIPTIO discovery 73:17 74:9, 15 duly 5:5 dultes 10:21 15:22 5:5 10:13 15:22 5:5 10:13 15:22 15:23 15:22 5:5 10:13 15:23 16:11 discuss 27:2 15:22 16:14 15:9 17:11 design 72:12 41:11 66:7 17:14 82:19, districts 54:5 districts 54:5 districts 54:5 districts 54:5 districts 54:5 districts 54:5 desire 72:12 detailed 166:12 120:24 123:14 85:11, 23, 24 dynamic 150:16 157:5, devening 70:13 determination 154:5 108:23 111:9,			•			
N 3:14 62:7		· ·	· '			
166:11				, ,		
designer 31:22 41:11 66:7 19 62:7 169:2 92:22 101:10 139:16 176:3 32:10, 16 77:14 82:19, districts 54:5 171:5 125:1 137:11 evening 70:13 desire 72:12 detailed 166:12 120:24 123:14 85:11, 23, 24 document duty 48:13 146:19 149:1 evening 70:13 details 44:1 124:8 143:8 86:3 87:15, 21 172:20 11 158:8, 12 12, 13, 21, 24 detective 154:5 discussed 7:23 22 112:8 Eagles 43:5, 8, 12 163:10, 14 47:15 65:14, 23, 21 21, 23, 11 47:15 65:14, 23, 21 47:15 65:1						
32:10, 16			· · · · · · · · · · · · · · · · · · ·			
desire 72:12 24 108:1, 9, 15 document duty 48:13 146:19 149:1 event 42:22 detaile 166:12 details 44:1 120:24 123:14 85:11, 23, 24 dynamic 150:16 157:5, 43:5, 7, 10, 11, 150:16 157:5, 43:5, 7, 10, 11, 17:16 43:5, 7, 10, 11, 17:17 43:5, 7, 10, 11, 17:18 12:12 13, 21, 24 43:5, 7, 10, 11, 17:18 12:12 13, 21, 24 43:5, 7, 10, 11, 17:18 163:10, 14 47:15 65:14, 21, 32, 12, 24 44:15 66:19 47:15 65:14, 47 47:17 11, 47 47:17 11, 47 47:17 11, 47 47:17 11, 47:17, 47:						
detailed 166:12 120:24 123:14 85:11, 23, 24 dynamic 150:16 157:5, 11 43:5, 7, 10, 11, 12, 13, 21, 24 detective 154:5 108:23 111:9, 106:16 134:11 discussed 7:23 22 112:8 ES.18 170:5, 171:18 Esgles 43:5, 7, 10, 11, 12, 13, 21, 24 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:13 62:17 8, 11 171:1, 8 60:21 95:8 118:4 156:19 96:13 102:3, 6 develop 13:17 82:21 91:17 documentation 15:8 62:4 76:2 77:14, 15 15:7:16 159:16, 13:19 13:19 22:1 11:13 22 130:6, 23 documents 117:8 120:4 19, 22 events 11:14 11:13 13:20 15:1 7:20 15:7:7,11 130:23 138:8 employment 46:17,20 47:3,4 <t< td=""><td>•</td><td></td><td></td><td></td><td></td><td></td></t<>	•					
details 44:I 124:8 143:8 86:3 87:15, 21 108:23 111:9, 172:20 I1 158:8, I2 163:10, I4 47:15 65:14, 12, I3, 21, 24 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 47:15 65:14, 17:15 65:14, 47:15 65:14, 17:11, 8 47:15 65:14, 17:11, 8 47:23 175:1 46:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:3, 18 60:21 95:8 118:4 156:19 118:4 156:19 96:13 102:3, 6 96:13 102:3, 6 96:13 102:3, 6 96:13 102:3, 6 96:13 102:3, 6 96:21 95:8 118:4 156:19 118:4 156:19 40:21 95:8 118:4 156:19 118:4 156:19 418:4 156:19 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
detective 154:5 discussed 7:23 108:23 111:9, determination 11:22 51:6 discussed 7:23 121:12:8 < Es> eagles 43:5, 8, determination 163:10, 14 employees 19, 20 77:5 47:15 65:14, employees 19, 20 77:5 49:13 102:3, 6 102:3, 6 102:3, 6 103:23 17:5 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 91:17 40:21 93:18 40:21 95:8 118:4 156:19 events 11:14 156:19 159:16, 159:16, 159:16, 159:16, 159:16, 159:16 118:4 156:19 22:1 11:14 156:22 22:1 11:14 10:3 156:22 22:1 events 11:14 43:19 22:1 42:21 43:4 43:19 22:1 11:14 13:20 154:1 7:20 151:7, 11 130:23 138:8 employment 4:22:1 45:17, 20 47:3, 41:3, 41:3, 41:3 45:17, 20 47:3, 41:3, 41:3 45:16:17, 10:3, 9, 13, 20 21 162:20 163:17 16:23 144:13 151:21 6, 8, 11, 14 employment 4:6:17, 20 47:3, 41:3, 41:3, 41:3, 41:3 45:16:17, 11 45:16:220 163:27 16:220 163:27 16:220 163:27 16:220 163:27 16:220 163:27 16:220 163:27 17:15 17:15 ends 66:14 71:3 117:19 24:17:19 ends 66:14					· · · · · · · · · · · · · · · · · · ·	
106:16 134:11 discussed 7:23 22 112:8 56:6 158:18 170:5, 56:6 158:18 170:5, 56:6 62:12 8, 11 171:1, 8 12, 13, 18 102:3, 6 118:4 156:19 11:13 22 130:6, 23 documents 131:20 154:1 158:9 162:13, 167:1 169:24 discussing doing 8:20 different 7:14 discussing 46:3 71:11 72:12 22:1 38:11 172:12 22:1 38:11 172:12 22:2 30:13 46:1, 15 48:20 126:24 127:1 29:22 30:13 46:1, 15 48:20 126:24 127:16 46:22 127:16 46:22 127:16 46:21 103:3 45:1 45:19 46:37 127:16 46:21 103:4 130:23 138:8 and the same of the			· ·	1,2,20		
determination 11:22 51:6 158:18 170:5, 56:6 62:12 Eagles 43:5, 8, 12, 13, 18 36:23 49:20 96:13 102:3, 6 174:23 175:1 56:6 62:12 8, 11 171:1, 8 42, 13, 18 60:21 95:8 118:4 156:19 develop 13:17 developing 93:4 128:18, 93:4 128:18, 15:8 62:4 15:8 62:4 76:2 77:14, 15 110:3 156:22 events 11:14 11:13 22 130:6, 23 documents 117:8 120:4 19, 22 42:24 43:4 deviate 117:16 deviates 124:4 dials 68:4 15 167:2 170:3, 9, 13, 20 14:19 15:18 147:10 156:13, 144:13 151:21 6, 8, 11, 14 46:17, 20 47:3, 46:17, 10 different 7:14 dials 68:4 15 167:2 170:3, 9, 13, 20 163:17 167:23 94:16 encouraging 48:6, 22 67:9 13:6 22:12 distance 66:13 92:7 14:19 15:18 17:15 171:15 early 78:8 enjoyed 173:7 enjoyed 173:7 24 eventually 12:2 2 93:10 discussion 42:20 44:8 earle 146:5 ensure 14:4 enjoyed 173:7 everybody 13:8 153:13 los:4 164:10 foi:15 61:5 61:12 11:1 4:7 102:9 113:18 140:6 16:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 <td< td=""><td></td><td></td><td></td><td> < E ></td><td>· · · · · · · · · · · · · · · · · · ·</td><td>•</td></td<>				< E >	· · · · · · · · · · · · · · · · · · ·	•
174:23 175:1 56:6 62:12 8, 11 171:1, 8 12, 13, 18 60:21 95:8 118:4 156:19						
develop 13:17 developing 82:21 91:17 developing documentation 15:8 62:4 documents Earlier 72:11 76:2 77:14, 15 157:16 159:16, 13:19 22:1 13:19 22:1 17:8 120:4 19, 22 42:24 43:4 42:24 43:4 42:24 43:4 42:24 43:4 42:24 43:4 158:9 162:13, 167:1 169:24 170:3, 9, 13, 20 different 7:14 dials 68:4 15 167:2 different 7:14 discussing different 7:14 discussing discussing 40:0 8:20 163:17 167:23 194:16 69:1 70:19 13:6 22:12 66:13 92:7 14:19 15:18 171:15 ends 66:14 enjoyed 173:7 24 enter 102:11 everybody enter 102:11 enter 128:9 enter 128:9 enter 128:9 enter 128:9 enter 103:29 113:18 140:6 enter 102:11 enter 102:21 dismissive dismissive 135:8 144:18, 136:15, 16, 21 113:19 123:14 123:14 13:15 110:10 11:0 11:0 11:0 11:0 11:0 11:0 11			· · · · · · · · · · · · · · · · · · ·	, ,		· · · · · · · · · · · · · · · · · · ·
developing 93:4 128:18, 15:8 62:4 76:2 77:14, 15 157:16 159:16, 13:19 22:1 11:13 22 130:6, 23 documents 117:8 120:4 19, 22 42:24 43:4 deviates 124:4 158:9 162:13, 167:1 169:24 147:10 156:13, 144:13 151:21 6, 8, 11, 14 dials 68:4 15 167:2 170:3, 9, 13, 20 21 162:20 encouraging 48:6, 22 67:9 different 7:14 13:6 22:12 66:13 92:7 14:19 15:18 171:15 ends 66:14 71:3 117:19, 31:9 34:8 109:20 120:5 16:14, 17 19:1 early 78:8 enjoyed 173:7 24 46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 13:6:13 13:13 15:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 16:18 168:21 10:19 46:2 91:1, 13 79:23 85:9 169:16, 19 entire 128:9 everyday 6:7 difficulties 10:10 119:24			1 '	· ' '		
11:13						
deviate 117:16 131:20 154:1 7:20 151:7, 11 130:23 138:8 employment 46:17, 20 47:3, 6, 8, 11, 14 deviates 124:4 158:9 162:13, 169:24 167:1 169:24 147:10 156:13, 144:13 151:21 6, 8, 11, 14 6, 12 6, 8, 11, 14 6, 12 6, 8						
deviates 124:4 158:9 162:13, 167:1 169:24 147:10 156:13, 144:13 151:21 6, 8, 11, 14 dials 68:4 discussing doing 8:20 163:17 167:23 94:16 69:1 70:19 13:6 22:12 66:13 92:7 14:19 15:18 171:15 ends 66:14 71:3 117:19, 31:9 34:8 109:20 120:5 16:14, 17 19:1 early 78:8 enjoyed 173:7 24 46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 136:6 137:6 67:20 83:4 50:14, 21 EASTERN entered 23:20 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 12	1 1				I to the second	
dials 68:4 15 167:2 170:3, 9, 13, 20 21 162:20 encouraging 48:6, 22 67:9 different 7:14 discussing doing 8:20 163:17 167:23 94:16 69:1 70:19 13:6 22:12 66:13 92:7 14:19 15:18 171:15 ends 66:14 71:3 117:19, 31:9 34:8 109:20 120:5 16:14, 17 19:1 early 78:8 enjoyed 173:7 24 46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 126:24 127:1 29:22 30:13 46:1, 15 48:20 11 enter 102:11 everybody 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 8, 15, 19 44:15 98:9						
different 7:14 discussing doing 8:20 163:17 167:23 94:16 69:1 70:19 13:6 22:12 66:13 92:7 14:19 15:18 171:15 ends 66:14 71:3 117:19, 31:9 34:8 109:20 120:5 16:14, 17 19:1 early 78:8 enjoyed 173:7 24 46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 everybody 136:6 137:6 67:20 83:4 50:14, 21 EASTERN entered 23:20 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>						
13:6 22:12 66:13 92:7 14:19 15:18 171:15 ends 66:14 71:3 117:19, 31:9 34:8 109:20 120:5 16:14, 17 19:1 early 78:8 enjoyed 173:7 24 46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 126:24 127:1 29:22 30:13 46:1, 15 48:20 11 enter 102:11 everybody 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 169:16, 19 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entire 128:9 evidence 8:20 29:15 dismiss						
31:9 34:8 109:20 120:5 16:14, 17 19:1 early 78:8 enjoyed 173:7 24 46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 126:24 127:1 29:22 30:13 46:1, 15 48:20 11 enter 102:11 everybody 136:6 137:6 67:20 83:4 50:14, 21 EASTERN 102:9 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 8, 15, 19 44:15 98:9 105:22 109:8 63:15 67:10 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21						
46:3 71:11 172:12 22:1 38:11 earned 146:5 ensure 14:4 eventually 72:22 93:10 43:20 44:8 42:20 44:8 70:16 124:3 33:12 55:12 126:24 127:1 29:22 30:13 46:1, 15 48:20 11 enter 102:11 everybody 136:6 137:6 67:20 83:4 50:14, 21 EASTERN 102:9 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEOC 134:7, environment exact 10:2 8:20 29:15 dismissive 135:8 144:18, 136:15, 16, 21						
72:22 93:10 discussion 42:20 44:8 easier 148:5, 70:16 124:3 33:12 55:12 126:24 127:1 29:22 30:13 46:1, 15 48:20 11 enter 102:11 everybody 136:6 137:6 67:20 83:4 50:14, 21 EASTERN entered 23:20 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 8, 15, 19 44:15 98:9 105:22 109:8 8:20 29:15 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, <						
126:24 127:1 29:22 30:13 46:1, 15 48:20 11 enter 102:11 everybody 136:6 137:6 67:20 83:4 50:14, 21 EASTERN 102:9 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 EEOC 134:7, environment exact 10:2 8:20 29:15 dismiss 42:4 132:7, 11 8, 15, 19 44:15 98:9 105:22 109:8 63:15 67:10 54:17 58:11, 23 146:21 137:9 15 143:21 exactly 72:21 digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1						
136:6 137:6 67:20 83:4 50:14, 21 EASTERN 102:9 14:15 67:24 138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 EEOC 134:7, environment exact 105:22 109:8 8:20 29:15 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1			46:1, 15 48:20	1	enter 102:11	
138:4 153:13 105:4 164:10 56:15 61:12 1:1 4:7 102:9 113:18 140:6 161:8 168:21 disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 EEOC 134:7, environment exact 105:22 109:8 8:20 29:15 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1				EASTERN		
disgruntled 73:6 77:21 Eddis 166:18 entire 128:9 everyday 6:7 difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 EEOC 134:7, environment exact 10:2 8:20 29:15 dismiss 42:4 132:7, 11 8, 15, 19 44:15 98:9 105:22 109:8 63:15 67:10 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1			· ·			113: <i>18</i> 140: <i>6</i>
172:16 46:2 91:1, 13 79:23 85:9 169:16, 19 entities 39:8, evidence difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 EEOC 134:7, environment exact 10:2 8:20 29:15 dismiss 42:4 132:7, 11 8, 15, 19 44:15 98:9 105:22 109:8 63:15 67:10 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1		disgruntled				
difficult 101:9 92:22 95:8 99:12 114:5 EEO 135:9 10 165:10 177:5 difficulties 101:10 119:24 124:10 EEOC 134:7, environment exact 10:2 8:20 29:15 dismiss 42:4 132:7, 11 8, 15, 19 44:15 98:9 105:22 109:8 63:15 67:10 63:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1		O				
difficulties 101:10 119:24 124:10 EEOC 134:7, 8.15.19 environment 44:15 98:9 exact 10:2 8:20 29:15 dismiss 42:4 132:7, 11 8, 15, 19 44:15 98:9 105:22 109:8 63:15 67:10 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, 15 143:21 exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating equal 62:13, 113:1	difficult 101:9		99:12 114:5	EEO 135:9	1	165:10 177:5
63:15 67:10 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1		101: <i>10</i>	119:24 124: <i>10</i>	EEOC 134:7,	environment	exact 10:2
63:15 67:10 dismissive 135:8 144:18, 136:15, 16, 21 112:12 125:6, exactly 72:21 104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1		dismiss 42:4	132:7, 11			
104:21 54:17 58:11, 23 146:21 137:9 15 143:21 exaggerating digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1		dismissive	· ·		112:12 125:6,	
digging 15 163:23 167:6 eight 71:1 equal 62:13, 113:1	104:2 <i>1</i>	54:17 58:11,				
	digging		163:23 167:6	eight 71:1	equal 62:13,	
		Disney 40:7		0		EXAMINATIO
20 135:1, 4, 20 disobey 45:6 dollars 31:21 128:9 167:17, 19, 24 N 3:7 5:12		disobey 45:6	dollars 31:21	128:9	167:17, 19, 24	N 3:7 5:12
dinners 43:14 disobeying 32:10 33:6 either 118:8 168:1, 5, 16 examined 5:6		disobeying	32:10 33:6	either 118:8	168:1, 5, 16	examined 5:6
DIRECT 3:7 45:18 donate 43:15 155:7, 9 169:9 170:6, example 18:20			donate 43:15	155:7, 9		example 18:20
5:12 177:18 dispute 110:24 donated 33:9 168:18 175:7 19 171:2 31:18 33:20				1		_
directed 132:8 111:7 46:3 elaborate equally 69:15 exception	directed 132:8	_	46:3	elaborate	equally 69:15	exception
133:11 disregard donors 23:4 15:16 72:16 equals 11:5 39:19		disregard	donors 23:4	15:16 72:16		_
directly 49:22 77:22 98:6 doors 96:14 153:11 17:7 excess 118:23	directly 49:22	-	doors 96:14	153: <i>11</i>		excess 118:23
66:13 113:14 disrespect doorway 103:1 electrical equation excluded 165:7	66: <i>13</i> 113: <i>14</i>	disrespect	doorway 103:1	electrical	equation	excluded 165:7
director 11:8 171:24 Doren 145:6, 34:10, 12 35:9, 55:19 56:9, 20 excluding		_	, *	34:10, 12 35:9,		excluding
36:19 55:20 disrespectful 16 146:7, 10, 15 36:14 equipment 160:16	36:19 55:20	disrespectful	<i>16</i> 146:7, <i>10</i> ,	<i>15</i> 36: <i>14</i>	equipment	160: <i>16</i>
56:17 152:17 44:16 45:18 18 electrician 38:24 exclusively	56:17 152:17	44:16 45:18	18	electrician	38:24	exclusively
155:24 156:5 77:21 98:11 34:12, 13, 14, 90:19 91:23	155:24 156:5	77:21 98:11	I	I 34:12, 13, 14,	I	90: <i>19</i> 91:2 <i>3</i>

Excuse 17:3	79: <i>14</i> 114: <i>15</i>	fiance 156:17	72:19 75:10,	foregoing	fundraisers
25:20 64:19	123:12, 13	Fifteen 160:4	11 81:14 82:2,	177:6, 16	62:2
148:2 <i>4</i> 152: <i>11</i>	149:2 <i>1</i>	fight 66:2	17 85:7 86:3	forget 27:22	fundraising
153:2	fair 42:9	154:22	87:15 88:15,	47:24 57:22	12:8 38:12, 18
executive	135:17	fighting 63:13	17 98:24	106:17 138:24	funds 12:3
155:24 156:5	fairly 134:13	173: <i>13</i>	99:13, 22	forgive 157:3	28:18 37:19
Exhibit 176:22	135:12	figure 27:4	100:6, 18, 20	form 134:7, 8,	118:23 123:24
Exhibits 3:18	Falco 96:6, 11	figured 154:14	111:19 117:16	19	161:20
exit 115:14	97:20 101: <i>17</i>	file 75:24	123:5 127:18	forms 51:6	further 24:18
experience	102:22 163:3	filed 47:20	128:20 130:17	forward	136: <i>11</i>
15: <i>14</i> , <i>17</i> 73:6	fall 75:1	90:2 <i>1</i> 137:8	132:5 148:8,	118: <i>19</i>	fuzzy 32:6
experiencing	fallen 53:6, 8	fill 134:8, 19	13 154:3	forwarded	
110: <i>1</i>	falsely 40:12	filling 65:19,	157:7 165:8,	125: <i>11</i>	<g></g>
experts 28:13	familiar	20	<i>13, 14</i> 168:8	fought 119:21	games 32:18
expired 115:24	142: <i>15</i>	filter 55:20	fiscal 119: <i>16</i>	foul 22:2	gathered
explain 14: <i>12</i>	families 43:19	filtered 59:16	fit 39:23	found 26:2	120:13, 14
18:23 19:2	family 72:20	final 26:16	Fitzpatrick	28:13 41:13	general 17: <i>14</i>
24:18 38:7	115:24	36: <i>16</i> 55: <i>13</i> ,	1:1 2:1	45:7 70:12	18: <i>1</i> , <i>3</i> , <i>9</i> 19: <i>5</i>
51:7 60: <i>13</i>	far 16:21	20 59:4, 10, 17,	five 15:21, 22	99: <i>15</i> 116: <i>18</i>	120:18 163:18,
79:17 90:20	101:2 <i>1</i> 116: <i>19</i>	22, 24 61:5, 8	29:14 30:4	117:2 138:22	<i>19, 21</i> 164: <i>1</i>
109: <i>1</i> 113: <i>16</i>	117: <i>3</i> 142: <i>16</i>	66:5 162: <i>17</i> ,	31:8 34:15	four 30:4	gentleman
explained 16:6	Fast 118:19	<i>19</i> 174:23	71: <i>1</i>	85:2 <i>4</i> 127: <i>17</i> ,	141: <i>1</i>
23:1, 3 32:23	Faust 42:21	175: <i>1</i>	five-minute	18, 20 128:10,	gesture 58:5
47:18 49:23	44:13 47:1, 5	finalized	64:1, 5	15	gestures 54:19
57:17, 24	51:3, 14 65:13,	109:19	five-year 38:20	frame 151:1	77:22
73:19 74:12,	16, 17 91:4	finally 57:2	fix 26:17	Fran 21:1	getting 8:16
13, 23 76:14,	95:9, 11 96:2,	finance 46:22	27:10 28:19	27:17 28:3	22:18, 19 23:2,
15 79:8 98:4	3, 5, 9, 10, 16	47:13, 19, 20,	33:2, <i>14</i> 35:4 39: <i>4</i>	56:6 57:16, 17 175:11	4 24:21 31:15 37:16 38:5
109: <i>18</i> 112: <i>24</i> 115: <i>19</i> 119: <i>22</i>	97: <i>19</i> , <i>22</i> , <i>24</i> 98: <i>3</i> , <i>15</i> 99: <i>9</i>	21, 22 48:7, 10, 21, 24 49:1, 4	fixed 28:16	Francis 74:7,	40:24 41:9, 10
143:21 149:20	101:16 102:22	finances 11:14,	31:13 84:2	17, 22 75:9, 10,	66:11 68:22
166:2 168:9	121:5 127:8,	16 62:1 118:6,	85:8	12 76:10, 16	78:4, 22 84:5
169:15 174:16	10 128:9	9	flagged 57:10,	150:21, 23	87:19 96:17
explaining	129:10 131:16	financial 15:5	12 58:3	Frank 28:5, 6	133:18 143:23
24: <i>4</i> 56: <i>14</i>	163:5, 9, 10	118:7	flagging 58:4	34:13, 20	144:1, 3, 14, 16
109:9, <i>12</i>	Faust's 129:22	find 27:10	flexible 71:7, 9	Fred 106:19	161:2 <i>1</i> 173: <i>16</i>
explanation	favor 72:18	45:2 <i>1</i> 65:2 <i>4</i>	Floor 2:1	freeze 85:5	174:9
43:24	73:24 76:22	115: <i>5</i> , <i>9</i> , <i>17</i>	43:10 44:3	87:4	gifts 46:11
explicitly	120:2 <i>1</i>	116: <i>1</i> 2, <i>1</i> 5, 24	focus 120:2	Friday 47:9	giggling 103:2
116: <i>15</i>	favorable	117: <i>4</i>	121: <i>1</i>	112: <i>12</i> 127: <i>17</i>	girls 119:8, 9,
express 133: <i>1</i>	132:19	finding 116:20	follow 49:14,	144:20	10, 11
162:7	fear 136:11	finds 135:20	20, 23 100:3	friend 72:20	gist 143:13
expressed	FEBRUARY	fine 6:11, 24	166:3	friends 102:22	give 5:23
52:10 115:4	1:1 4:9 feedback 8:17	10:3 12:20	followed 21:1	front 22:10 108:24 143:5	6:15 18:20
extreme 140:7 eye 138:24	feel 112:15	52:10 82:17 176:9	133:17	frozen 68:3	31:18 33:20
eyes 54:18	143:9	finger 21:12	following 49:6, 10, 12 50:23	fully 14:24	36:9 43:15, 18, 23 58:24
eyes 54.16	feeling 22:4	fingers 126:13,	100:4, 24	177:5	70:18 85:12
< F >	144:4, 12	14	144:24	fund 119: <i>13</i>	86:4 90:12
face 44:17	fell 53:5	finish 6:15, 16	follows 5:7	funding 12:17	95:15 106:15
facilitating	Fells 21:3	159:3	148:10	13:1 23:3	110:7 116:14
40:11	felt 23:18	fire 34:10	follow-up	24:7 26:20, 23	118:8 122:18
facilities 19:22	31:10 33:4, 11	35:5	125:20 148:6	29:9, 11 36:23	124: <i>11</i> 129:8
27:5, 14 33:2	36:15 38:21	first 9:7	fools 51:11	38:4 40:24	130:9, 10, 11
37:22, <i>23</i> 38: <i>1</i>	101:5 112:2 <i>1</i>	19: <i>14</i> , <i>18</i> , <i>19</i>	FOP 107:12,	41: <i>1</i> 59: <i>13</i>	143:9 146: <i>3</i>
151: <i>17</i>	114:5 126:22	20:6, 16, 17, 20	<i>14</i> , <i>15</i> 130: <i>14</i>	142:8	157: <i>1</i> 168:23
facing 44:18	128:19 143:18	35:20, 22	166:7	fundraiser	given 5:22
fact 23:17	female 107:9	43:23 44:7	forced 116:6	151:23, 24	8:14 23:17
38: <i>19</i> 41: <i>4</i>	I	55:6 70:3, 4	I	I	52:12 73:21

76: <i>1</i> 2 117: <i>1</i>	47:12, 19 48:6,	governing	handwriting	held 29:22	hysteria 66: <i>17</i>
119:24 131:5,	21, 22, 23	157:24	112:7	30:13 67:20	_
6 135:12	49:11 57:10,	graduated 72:9	handwritten	105:4 156:2	<i></i>
149:21	12 58:11, 13,	great 24:3	112:1	164:10	idea 49:11
gives 25:5	18, 19, 22 62:1,	70:2 85:22	handy 87:19	hell 123:22	74:21 91:10
giving 7:4	2, 3 66:1	117: <i>14</i>	Hang 31:24	124:13	ideas 167:14
24:8 123:8	70:20 71:5, 18	GREEN 2:1	55:14 67:12	help 138:1	identification
137:22	75:21 76:17,	3:8 4:21 30:3	85: <i>13</i> 142: <i>10</i>	helped 68:24	176:24
gland 138:23	21 77:2, 9	44:24 45:4	happen 58:11	helps 159:13	identify 121:23
139:1	78:16 79:8 83:22 84:10	64:3, 6, 9 68:4	63:22 66:20 74:21 78:13,	Hero 151:22,	ignored 36:13
go 5:24 6:12		76:6 82:7, 12	14:21 78:13, 14 124:4		58:2 147:19
19:5, 20 23:7 28:17 29:19	85:11, 22 86:4	84: <i>12</i> 88: <i>16</i> , 22 89: <i>13</i> , 20,		hey 34: <i>14</i> 48: <i>8</i>	Ike 30: <i>1</i> 147:24 175:2 <i>1</i>
32:4, 11 33:12	87:4, 8, 13, 14 88:7 89:3, 17	23 95:17	happened 20:4 23:17	high 122:16	Ike@minceyfitz
	90:6, 8 91:19,	100:7 103:24	27:1 57:13, 24	higher 133:8,	ike@mmceyntz
34: <i>19</i> , <i>22</i> 35: <i>6</i> 37: <i>5</i> , <i>8</i> 39: <i>23</i>	20, 21, 22 94:5	104:3 108:11,	64:23, 24 65:3	15 135:16	notriolznogg com
43:17, 19	96:8 97:11, 16	16, 19, 21	101:22 104:16	highlight 90:10	patrickross.com 2:1
45:12, 14	98:5, 16 99:21	136:22 137:1	105:12 106:7,	hire 34:13, 14,	Ike's 76:4
45.12, 14 46:21 47:14,	101:22 102:7	130.22 137.1	9 108:7 113:1,	16, 21 173:2	imaging 95:7
20 48:9 50:22	101.22 102.7	147:23 148:2,	5,8 114: <i>18</i>	hired 34:12	immediate
54:16 59:19	105:16 109:9,	13, 16, 21	123:3 146:5	144: <i>14</i> , <i>16</i> , <i>17</i>	123: <i>15</i> 133:9
60:15 61:3	12, 20 110:6,	149:11, 14	147:19	157:14	immediately
66:15 67:15	19, 22 111:6,	155:12 164:15	happening	Hold 29:16, 17	20:21 26:14
74:24 77:8	16, 17 114:12	167:20 175:22	65:23 85:15	152:11 158:23	52:12 54:14
81:21 88:9, 10,	115:20 118:24	176:11, 17	happens 52:16	164:6	55:8 90:17, 23
17 98:6, 7	119:19 120:11	Greg 145:6,	happy 109:17	holds 142:2	102:11, 23
99:18 100:22	121:18, 19	16 146:7, 10,	hard 19:3	holiday 39:18	103:3 113:14
103:21, 22	122:18 123:19	18, 20, 24	73:20 98:14	Hollis 2:1	123:20
103.21, 22	124:14, 15	147:3	166:2	4:11	impetus 58:22
104:17, 21	129:5 130:9	guess 36:2	harder 45:19	home 66:15,	implement
111:16, 17	134:16 135:12,	114:11 176:19	Harris 65:13,	19 84:22	55:10 62:8
115:6 116:3, 5	16 137:5	guessing 7:1	18, 20 121:5	113:18 130:11	63:1 173:2
117:18 118:21	140:10 143:18	82:8	hasty 20:10	homework	implemented
119:12 128:7,	146:20 149:23	guilty 116:20	head 151:8	34:11	16:22 54:2 <i>4</i>
20 129:1	154:16, 21	117:3	heading 146:22	honest 53:1	55:17 57:14
132:8, 22	161:22 170: <i>1</i>	gun 66:16	headquarters	73:14 147:5	62:17 154:17
133:3, 4, 8, 10,	172:10 173:24	guy 27:19	33:5, 7, 8, 10	hopes 143:9	implementing
11, 15, 17	174:12	38:13	34:23 43:6	hoping 146:4	170: <i>17</i>
134: <i>13</i> 135: <i>5</i> ,	GOLDEN 2:1	guys 51:10	102:8 162:6	Hospital 70:9	importance
18 139:2	3:9 4:23 5:22	gym 22:11, 12	163:5, 8	host 119:10	122:16
140:8 144:5,	68:2 147:24	23:12 29:1	health 115:20,	hostile 44:15	important
<i>14</i> 145: <i>1</i>	148: <i>3</i> , <i>15</i>		21 138:8, 11	98:9 112: <i>1</i> 2	5:24 6:6 24:7
148:3, 8, 13	155: <i>14</i> , <i>18</i>	<h></h>	139:12	125:5, 15	27:9 41:19, 21
154:22 159:2,	158:24 159:10	habit 118: <i>15</i>	Healy 56:6	172:24	improve 68:5
7 162:6	164: <i>6</i> , <i>13</i> , <i>23</i>	half 87:15	57:16, 17	hours 70:11,	improvements
165:2 <i>1</i> 166: <i>1</i>	167:22 168:3	128:2 156:6, 7	175: <i>11</i>	13, 23, 24 71:8,	61:23
173:20	175:5, <i>16</i> , <i>21</i>	hallway 34:23	hear 8:22 9:7	10	inability 101: <i>1</i>
goes 118:3	176:5, <i>10</i> , <i>14</i>	hand 21: <i>17</i>	52:4 77:7	Human 136:9,	inaccurate
going 5:22	golf 45:22	58:6 77:22	108: <i>11</i> 132:9,	15	92: <i>3</i> , 8 113: <i>11</i>
6:8, 13 7:2	golfing 38: <i>3</i>	handbook	<i>23</i> 133: <i>1</i> , <i>2</i> , <i>3</i> ,	hundred 23:9	inch 22:13
14:21, 24 15:2	41:14	158:8, 11, 12,	5 170:24	32:10 43:16	incident 65:3
17:24 18:24	Good 4:18	15, 17	heard 65:5, 22	hundreds 46:6	66:18, 21
19:23 21:14,	5:15 24:21, 22	handle 34:15	97: <i>18</i> 101: <i>16</i> ,	hunt 115:7	71:19 72:4
21 23:18 24:4	31:18 54:13	43:7 118:9	19 103:3, 5, 11,	135:6	97:8, <i>13</i> 98: <i>17</i>
26:2, 5 27:8	74: <i>11</i> 115: <i>16</i>	119:2 <i>3</i> 132: <i>16</i>	12 143:6	hyphen 140:23	101:22 105:17
28:17 29:17	gossip 122:15	148:12 154:20	hearing 67:24		106: <i>3</i> , <i>4</i> , <i>13</i>
31:8 34:16, 17	gotten 22:21	handled 69:2	103:5 116:2 <i>1</i>	hypothyroidism	108: <i>4</i> 109: <i>3</i>
36:10 37:10	141:22 142:8	handling	he'd 45:22	138:22	112: <i>15</i> , 22
44:2 45:8, 12		127:19			113:5, <i>13</i>
·					

114:17 116:22	interfere	<i>17</i> 127:6	56:16, 17 62:6	kids 21:24	87:10 89:7
118:18 120:5,	135:14	134:11, 24	69:15 70:2	22:18, 19, 21	91:7 92:15, 19
9, <i>13</i> 121: <i>4</i>	interfering	135:13, 14, 17	72:10 73:4	23:6, 9, 14	95:2, 10 96:3
130:21 131:17,	134: <i>10</i>	137:20, 21	80:22 98:14	24:6 32:16, 19	98:6, 7, 23
22 171:13	Internal 51:4,	investigations	101:1, 9	33:1, 15 39:21,	99:1, 6 101:11
incidents	20 89:5 93:23	138:5	115:19 124:5	22, 23 40:16	103:4, 8
171: <i>16</i> 175: <i>14</i>	104:20 105:10,	investigator	133:17 143:8	46:4 74:24	103.4, 8
include 119:8	15, 24 106:8,	106:18 135:19	144:10 145:7	77:18 102:7	104.78 108.24
	13, 24, 100.8,		144.10 143.7	109:16 117:14	· · · · · · · · · · · · · · · · · · ·
included 165: <i>11</i>	110:21 111:19	investment 162:2			113: <i>19</i> 114:2, 6 116: <i>10</i>
		invite 39:21	169:2, 20, 23 171:5, 9	173:4, 5, 8 kind 32:4	
Including 91: <i>16</i> 168: <i>13</i>	114:13 115:2,				118:9, 16
	13 116:8, 12	156:24	jobs 173:2	58:6, 16, 18	120:17, 23
incorrect 16:21	122:2 126:2	invited 17:18	Joe 52:5, 19	72:23 76:3	122:11, 19
indicate 73:7	130:20 131:2	18:4, 6 102:6	53:17, 23 54:2,	90:8 110:23	124:1, 9, 17
indicating	134:6, 18, 24	165:14	8, 12 58:3	111:16 128:10	128:11 131:5,
21:17, 21	137:20, 21	involve 14:3	78:3 80:14	146:10	7, 23 132:14
individual	internet 32:6	involved 57:23	81:3, 21 82:2,	kinds 71:11	134:20, 21
72:19 73:1, 4	interpreting	94:10 120:12	18, 20 86:11	kitchenette	135:6, 7, 13, 15
75:14, 23	112:6	125:21, 23	91:23 93:5	102:13	137:8, 13
76:14 77:1	interrupt 6:7	126:8, 10	112:19 131:24	Klayman	140:15 141:2,
78:5, 22 80:5,	15:4 21:9	166:23 173:4	134:20 147:11	63:21 65:6	5 142:2, 4
20 81:15 82:3,	73:9	involving	Johnson 35:13,	66:15, 23	143:12 145:5,
4, 18 83:10	interrupted	39:18 50:14	18, 20, 24 36:2	70:15 94:3	8, 9, 10, 21
individuals	8:23	66:8 112: <i>16</i> ,	join 69:19	97:8 106:4	146:3, 7, 15
112:22	interrupting	22	123:11, 17	112:16 120:6,	147:1 151:8
individual's	6:14	ironically 91:3	joined 70:15	<i>15</i> 121: <i>4</i>	152:8, 10
73:11	interview	ISAAC 2:1	123:18	126:16 171:14	156:2, 4, 19
inform 93:7	106:10, 11, 14,	4:21	Joseph 4:19	knew 44:1	159: <i>14</i> 160:2,
information	<i>15</i> , <i>23</i> 107:22	isolating 42:18	5:17 9:12	82:22 87:3	15 161:13, 16
91:2, 23	108:2, 8, 14	43: <i>1</i> 132: <i>14</i>	jump 51: <i>11</i>	92:2 <i>1</i> 114: <i>1</i> 2	162:4, 18, 20,
informed 52:8	110:20, 24	issue 34:8	jumping 58:20	130:5 134:12	22 163:22
78:11 79:21	111: <i>18</i> , <i>19</i>	49: <i>4</i> 57: <i>3</i>	98: <i>3</i> 99: <i>16</i>	135: <i>11</i> , <i>17</i>	164: <i>4</i> 165: <i>1</i> , <i>6</i>
inoperable	112: <i>1</i> 114: <i>3</i>	63:10, 12	100:1, 5, 19	know 6:8, 21,	166:22 167:8
86:16	115: <i>14</i> 131: <i>5</i> ,	64:20 83:21	jurisdiction	22 7:9, 12, 16	168:22 169: <i>1</i> ,
input 157: <i>1</i>	7 134:6 168:7	124:6	53:5, 7, 9	9:4, 8 11: <i>13</i>	<i>14</i> 171:23
inquire 149:18	interviewed	issued 83:13,		12:19 13:18	172:2 <i>1</i> , 22
inspect 34:17	105: <i>16</i>	16 84:9, 16	< K >	15:2 16:11, 12,	173: <i>13</i> , <i>15</i>
inspecting 20:5	interviews	85:3	keep 87:5	20 17:21	174:7, 8, 18, 21
inspection 20:2	110:2 <i>1</i> 115:2	issues 67:24	88:7 115:10	18:23 19:2 <i>1</i> ,	175:6, 9
inspector	intimidate	68: <i>1</i> 83: <i>15</i> , <i>19</i>	133:20 134:12,	23 24:8 31:12	176: <i>13</i>
141:8, 18, 19	112: <i>10</i> 114: <i>6</i>	84:5 138:8, <i>11</i>	20 135:1, 3, 4,	32:12 33:2	knowing 24:20
instance 32:9	143:20	153:7 157:23	<i>19</i> 148: <i>4</i>	36:2, 15 37:9,	knowledge
34:9 60: <i>14</i>	intimidated	158:10 172:16	Keith 96:6, 11	20 38:18, 20	72:3, 7, 9
instruct 124:9	125:16	items 162:7	163:3	39:18 44:4, 17	115:12 116:8,
instructed	intimidating	its 12:3	kept 37:17	45:11, 17 46:7	13
24:7 26:16	114: <i>12</i>		41:9 42:4, 6	47:23 50:24	known 102:22
34:20 37:5	introduce 4:17	< J >	98:7 99:24	51:12 54:2, 6	135: <i>15</i>
44: <i>11</i> 51: <i>15</i> ,	invest 39:3	Jackie 125:22	128:9 173: <i>14</i>	55:2 56:7	knows 37:9
<i>16</i> 57:20 65:8	investigated	Janice 117: <i>10</i>	KEVIN 2:1	57:10, 13, 24	Krista 141:20
115:10	134: <i>13</i>	Jeff 146:9, <i>14</i> ,	4:23 5:21	58:5, 12, 14	142: <i>11</i>
instructions	investigation	23	176: <i>14</i>	59:11 66:11	
5:22, 23 6: <i>1</i>	92:5, 7 93:9,	Jeff's 146: <i>12</i> ,	Kgolden@ohag	68:23 72:15,	<l></l>
8:13 10:24	12, 17, 19, 22	13	enmeyer.com	21 73:16 74:4,	labeled 4:3
18: <i>18</i> 49: <i>6</i>	94:2, 6, 9, 11,	jeopardizing	2:1	8, 14, 17 75:11,	Labor 137:12
interest 52:15	15, 19, 20	115:2 <i>1</i>	kicked 133: <i>11</i>	17, 24 76:1, 21	lack 35:1
55:3 132:18	109: <i>4</i> 115: <i>13</i>	Jersey 1:1	kid 58:13	77:8, 21 79:10	lady 152:13
interesting	116:8 120:8,	Jimmy 70:5	74:11, 16	80:11 81:9, 10,	lag 141: <i>15</i>
126:18	17, 22, 24	job 45:20	76:17 77:17	17, 20 82:12,	laid 62:6
	121:2, <i>14</i> , <i>16</i> ,	49:5, 9 52:11	79:22 81:10	13, 15 83:22	largely 9:13

laugh 44:17 105:10, 18, 19 52:2 106:8, *12* laughed 124:12 108:5 121:24 122:1, 2 laughing 96:16 103:2, 7 125:10 126:1 130:19, 22, 24 123:21 125:14 **law** 1:1 2:1 131:1, 2, 8 5:6 **letting** 58:12 lawsuit 5:17 116:5 154:10 9:12 172:11 lawyers 159:13 level 59:22 **lazy** 169:19 74:5 162:16 **lead** 55:12 Lexitas 4:12, League 2:1 14 4:24 9:14, 21 Li 14:20, 23 11:1, 9 12:7 15:4, 5 16:5 13:13 36:20 21:4 22:16 40:14 129:11 34:17, 18, 19 47:19 55:9, 15 **learn** 20:9 104:19 105:9 118:7, 22 **learned** 127:21 119:15, 17 lease 161:2, 6, 158:9 11, 17 Liberty 1:1 leases 160:17, 2:1 20, 23 161:14 **LICENSE leave** 22:3 177:13 40:5, 16 41:12, lies 92:14 14 45:14 94:16 51:15, 16, 24 lieutenant 70:12 80:8, 19, 15:21, 22 22, 24 81:19, 51:13 73:24 77:6 80:2 21 84:22 85:1 91:18 99:3, 19 110:*13* 122:*6* 115:16, 22, 24 137:17 138:2, 116:4 128:24 3 152:24 133:2, 3 139:2 **liked** 173:4 142:21, 22 likes 117:15 170:1 172:10 **limited** 28:18 leaving 24:20 **Line** 3:18 **led** 172:6 59:5 83:22 **left** 9:10 32:5 122:*15* 72:10 143:2, 3, **lines** 143:6 15 145:9 lips 21:22 162:9 list 73:1, 2 **legal** 4:11 **listen** 100:2 56:5, 12 62:23 132:16 174:20 175:11 listening legs 154:19 133:19 length 128:18 literally 44:17 lesser 60:4 54:16 56:8, 19 132:24 133:4 **letter** 88:14, 24 89:4, 8, 11, literature 62:5 16 90:16, 17, **little** 5:24 22, 24 91:4, 8, 7:14 15:16 11, 13 92:2, 8, 19:18 21:8, 10 10, 15, 18, 21 29:8 31:20 93:4, 9 95:2, 5, 32:1, 6, 17 7, 12 97:12 38:7 39:13 104:17, 19 78:1 83:18

	2/14/	
	88:9, 10 92:1,	< M >
	5, 12, 17, 22	ma'aı
	93:7, 20 94:4,	main
	<i>5</i> 95: <i>13</i> 96: <i>3</i>	maint
	102:12 104:16	21: <i>1</i>
	117: <i>10</i> , <i>13</i> , <i>14</i> ,	28:2
	<i>15</i> 118: <i>12</i> , <i>16</i>	36:11
	119:3, 12, 18,	make
	20 120:3, 22	makii
	121: <i>10</i> 122:2 <i>4</i>	21:18
	125:22, 24	40:12
	126:5, 9, 13, 15,	45:19
	<i>17</i> 134: <i>17</i>	54:18
	144:12 157:22	76:17
	158: <i>10</i> 163: <i>13</i>	101:9
	168:24	147: <i>1</i>
	load 52:16	149:2
	located 28:24	male
	Logan 2:1	141:3
	long 9:5 10:5,	males
	<i>15</i> 15:23	man
	45:2 <i>4</i> 54:8 56:2 <i>3</i> 85: <i>3</i>	mana
	56:2 <i>3</i> 85: <i>3</i>	9
	127:7, 9	mana
	128:11 135:8	15: <i>15</i>
	156:2, <i>4</i>	138:4
	longer 41:12	mana
	43:9 44:1	man's
	57:22 145: <i>14</i> ,	mapp
	19	mark
	look 8:3	22 1
	19:22 72:24 122:5 129: <i>14</i> looked 21:6	121: <i>1</i>
	122:5 129: <i>14</i>	mark
	looked 21:6	86: <i>3</i>
	57:8 58:7	88:20
	73:3 86:10	90:5
	87:15 90:5, 22	122:1
	122:10 174:22	129:6
	looking 86:14	mark
	90:15 111:22	mask
	121:22 129:9	26:10
	159: <i>13</i>	matte
	looks 88:23	58:7,
	122:13	80:2
	loop 175: <i>12</i> lose 26: <i>20</i> , 22 loss 106: <i>17</i>	123:1
	lose 26:20, 22	124:8
	loss 106:1/	21, 23
	lot 26:3, 22	177:7
	32:24 33:5	matte
	36:12 38:2	112: <i>1</i>
	46: <i>14</i> 49:8	Maur
	58: <i>17</i> , 20 92:9	152:1
	108:3 147:10	154:7
	158:2 <i>1</i> 162: <i>11</i>	Mayo
	loud 112:6	137: <i>1</i>
	luncheon 104:7	McCa
- 1	HINCHAAN III/I·/	41.7/

. М s
< M >
ma'am 159: <i>3</i>
main 168:20
maintenance
21:1 27:19
28:2 35:6
36:11
maker 59:17
making 6:4 21:18 23:22 40:12 42:12 45:19 46:11
21.18 23.22
10.12 12.12
40.12 42.12
45:19 46:11
54:18 69:6, 9
76: <i>17</i> 98: <i>13</i>
101:9 109: <i>16</i>
147:11, 17
147.11, 17
149:23 165:17
male 140:16
141:3
males 132:20 man 149:19
man 149·10
managed 60.6
managed 69:6,
9
management
15: <i>15</i> , <i>18</i> 16: <i>3</i>
138:4 156:18
manager 28:2
man's 151:5
mapping 68:21
mark 85:13,
22 110:7
121:10 120:6
121: <i>19</i> 129: <i>6</i> marked 85: <i>24</i>
marked 85:24
86:3 87:16
88:20 89:18 90:5 96:23
90.5 96.23
122:1, 16
122.1, 10
129:6 176:23
marks 34:24
mask 22:8
26:10
matter 4:5
58:7, 8 75:24
30.7, 0 73.24
80:2 90:18
123: <i>12</i> , <i>13</i>
124:8, 15, 18,
21, 23, 24
177:7
matters 11:13
112: <i>14</i>
Maureen
152: <i>14</i> , <i>17</i>
154:7
Mayor's
137:12
McCauley
21 20 22 2
31:20 32:2
31:20 32:2 122:8 123:6

156:23 16	
mean 1 15:3, 17 17:15 : 38:10 : 50:19 : 57:7 5: 60:2 70 78:11	1: <i>11</i> 7 16: <i>15</i> 32: <i>15</i>
38: <i>10</i> 4 50: <i>19</i> 57: <i>7</i> 5	42: <i>16</i> 55: <i>23</i> 8: <i>4</i>
60:2 70 78:11 121:14 146:23	171.1/
	g 126:8
means 131:7 14 135:	90:20 134:2, <i>4</i> ,
136:4	177: <i>18</i>
136: <i>4</i> media	4:3
medical 138: <i>18</i>	116:3
meet 1 20:2 2:45:14	7: <i>13</i> , <i>23</i> 6: <i>15</i>
45: <i>14</i> : 73:22 22, <i>23</i>	153: <i>10</i> ,
meeting 2, 9 19:	18: <i>1</i> ,
54:15 6, 16 5'	56:1, 3, 7:23
58: <i>12</i> , <i>1</i> 62: <i>12</i> , <i>1</i>	5 6, 21,
22 63:2 65:12, 1	2, 8 '3, 15
66: <i>14</i> / 15 81:6	i, 14
82:2, 17 83:5 9 107:19	6:7
123: <i>12</i> , 126: <i>6</i>	17, 18
144:21 15, 19, 2	153:9, ?1
154:2 165: <i>14</i>	161:2 <i>3</i> 168: <i>1</i> 2 174: <i>1</i> 2
meeting	S
13: <i>14</i> , <i>1</i> 17: <i>14</i> , <i>1</i>	8, 19,
20, 21, 2 7, 15, 16 19:6, 8	5, 18, 22
98:16, 2	21
128:17, 130:3 21 157: 20 163:	131:20, :13, 19,
21, 23, 2	24
164: <i>1</i> , 3	3 165: <i>1</i> ,

12, 16, 20, 22, 23 166:23 member 33:9,
13 102:1 150:5 152:20 members
17: <i>13</i> 27: <i>6</i> , <i>15</i> 34: <i>4</i> 45: <i>23</i> 112: <i>11</i> 168: <i>13</i> , <i>16</i>
memo 118:2 129: <i>19</i> 130:8, 24 131: <i>10</i>
145:24 Memorandum 3:18 54:23
55:4 56:13, 21 57:1, 2 62:17, 18 114:16, 19 119:15 129:9,
14, 15 159:6 166:15 170:2, 4, 20 171:19
memory 97:7 memos 22:13 41:8 69:4
119:5 147: <i>14</i> men 153:7, 8
154:20 mental 139:12
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned 27:13 32:1 39:12 64:19, 20 74:9 76:11 77:5, 14, 15 90:24 91:13,
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned 27:13 32:1 39:12 64:19, 20 74:9 76:11 77:5, 14, 15 90:24 91:13, 14 92:24 95:11 96:6 125:7, 23
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned 27:13 32:1 39:12 64:19, 20 74:9 76:11 77:5, 14, 15 90:24 91:13, 14 92:24 95:11 96:6 125:7, 23 126:1, 9 138:7 143:7 146:24 150:18, 19 154:12, 20, 21
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned 27:13 32:1 39:12 64:19, 20 74:9 76:11 77:5, 14, 15 90:24 91:13, 14 92:24 95:11 96:6 125:7, 23 126:1, 9 138:7 143:7 146:24 150:18, 19 154:12, 20, 21 155:1, 2 156:13, 20
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned 27:13 32:1 39:12 64:19, 20 74:9 76:11 77:5, 14, 15 90:24 91:13, 14 92:24 95:11 96:6 125:7, 23 126:1, 9 138:7 143:7 146:24 150:18, 19 154:12, 20, 21 155:1, 2 156:13, 20 157:23 158:11 171:15 172:2, 3 mentioning
154:20 mental 139:12 mention 92:3 93:3 103:4 112:19, 20 150:15 151:13 mentioned 27:13 32:1 39:12 64:19, 20 74:9 76:11 77:5, 14, 15 90:24 91:13, 14 92:24 95:11 96:6 125:7, 23 126:1, 9 138:7 143:7 146:24 150:18, 19 154:12, 20, 21 155:1, 2 156:13, 20 157:23 158:11 171:15 172:2, 3

luncheon 104:7

met 7:15	MOU 57:10,	149:5	132:19	112:13 114:3,	156:11 157:22
17:14 22:5	13, 22 58:1, 13,	near 153:23	nonsense 77:7	4, 16, 20 121:6	158:10 160:2
27:13 72:17	22 62:9 77:14	nearby 103:15	Nope 28:12	122:15 126:17	163:3, 4, 6, 7, 8,
74:3 96:3	109:18, 19	necessary	89:9 91:9, <i>12</i>	133:11, 13	13 165:16
MEYER 2:1	154:17 167:5	37:18 73:5	95:3 117:7	136:6, 24	166:12, 18, 19
4:2 <i>4</i>	170:11, 13, 17	113:20	Normal 176:7	137:12 143:23	167:3 168:23
middle 139:9	170.11, 13, 17	neck 21:17	Notary 1:1	153:23 171:22	169:1, 16
million 33:6	174.11, 12, 13,		noted 177:5	172:8, 13	•
		need 7:6, 7, 11 12:14 18:23	notes 7:20	172.8, 13	171: <i>10</i> , <i>14</i> 173:20
Mincey 1:1	mouth 21:13, 22			•	
2:1		27:7, 11 34:14	177:6	20 175:3	officers 12:5,
mind 30:6, 22	mouthing	37:8 48:9	notice 117:1	officer 9:14,	10, 11, 12
68:13	145:8	51:11, 12	174:10	20 10:6, 9, 22,	13:13, 15, 19
mine 7:2 8:22	move 78:22	59:12 76:16	noticed 90:23	23 12:21 14:8	19:21 20:3
minimizing	122:22, 24	77:18 80:3	91:12 92:20	15:6, 8, 10, 13,	24:6 25:8
135:15	127:21 128:16,	88:5 123:7	notified 117: <i>1</i>	19, 24 16:3, 8	40:13 41:7
minute 86:4	23 129:1	139:17 142:17	notify 165:22	17:1, 4, 12	46:5, 17, 19, 20
88:9 95: <i>15</i>	130:9 131:16	145:6 147:4	November	19:15, 16	47:2, 7, 9, 13
150:2	149:2 <i>1</i>	154: <i>15</i> 171: <i>14</i>	129:21 130:16	20:18 22:5, 6,	48:11, 15, 22
minutes 51:2	moved 80:5	172:10 173:20	NUMBER	7 23:24 24:12,	49:16 50:21
58:17	moving 130:16	176:12, 18	3:14 4:3	24 25:7 26:9	60:9, 23 69:11
misappropriati	Mulholland	needed 18: <i>17</i>	177: <i>13</i>	29:10 31:20	74:23 90:23
on 123:24	70:5	20:1 23:19	nurse 70:8	32:1 34:9	91: <i>1</i> , <i>13</i> 94: <i>5</i> ,
missed 19:10	Myron 53:12,	34:19 37:17		35:12, 18, 20	7 97:19 107:3,
30:5 143:17	18, 20	38:6, 15 50:22	<0>	41:23 42:9	5, 13, 15 118:2
misunderstand		75: <i>4</i> 93:8	oath 7:15	46:10 48:7	120:10, 12
40:2 <i>1</i>	< N >	99:24 132:22	8:11, 12 24:17,	49:24 50:4, 14,	124: <i>1</i> , <i>3</i> , <i>7</i> , <i>9</i>
mold 20:22	Nadarih 122:8	143:8 145: <i>14</i> ,	19, 23, 24	17 55:18	127:2 128: <i>1</i> , <i>3</i> ,
22:9 24:20	123:6, 7	<i>19</i> 147:8	object 149:8	56:17 57:4	21 151:14
26:10, 18	124: <i>14</i> , <i>17</i>	needs 94:19	Objection	59:18 62:6, 7	156:2 <i>4</i> 157:2 <i>1</i> ,
moment 57:19	125:12 126:8,	121: <i>1</i>	82:7, 10 89:13	63:11, 20, 21	24 159:5, 12
72:17 90:9	9, 13 131:11	negative	obtain 144: <i>13</i>	64:21 65:6	166:5, 9
110:8 122:19	156:23 157:9,	135:20	obviously	66:6, 15 67:2	167:10 173:3,
129:8	10	negotiated	92:2 <i>1</i> 103:4	70:5, 15 72:12	6, 7, 14
Monday 47:9	Nadirah 31: <i>19</i>	161: <i>13</i> 174: <i>13</i>	occasion 54:18	74:11, 14, 18,	offices 1:1
127:16 145:12	32:2	Neighborhood	occur 97:9	19 75:1, 5, 6	2:1 175:8
money 12:3	name 4:11	71:23	153: <i>19</i> , <i>21</i>	78:9, 18 83:12	Oh 16: <i>17</i>
14:5 26:3	5:15 21:2	never 8:7, 9	occurred	92:1, 4, 12, 17	52:3 57:11
28:19 31:10,	27:22, 23 32:2	18:6 28:10, 11,	64:21 97:9	93:7, 15, 20, 23	64:6, 9 103:6
11 32:8, 9	35:21, 22 36:3	16 47:21 49:1	120:5 145:22	94:3, 4, 5, 24	108:19 122:8
33:2, 5, 12, 14	73:11, 13	51:20 57:14	146:8, <i>16</i>	96:3, 11 97:8	128: <i>13</i> 148:2
38:2 39:3	75:10, 11, 14,	87: <i>3</i> 116:24	164: <i>1</i> , <i>4</i> 165:2	98: <i>18</i> 101: <i>16</i> ,	157:10
48:5 117:18,	23 78:5 103:4	117: <i>1</i> , <i>5</i>	October 5:20	<i>17</i> , <i>23</i> 102:5,	O'HAGEN
<i>24</i> 118: <i>11</i> , 22	106: <i>16</i> , <i>17</i>	133:22 140:7	7:23 88:21	19, 20, 21	2:1 4:23
119: <i>13</i> 162:2	107:8, 10	146:5 147: <i>18</i>	97:4, 6 98:19	106: <i>4</i> 112: <i>16</i>	Okay 7:19, 22
monitor 70:21	136:23 140:2 <i>1</i>	162: <i>14</i>	130:24	117: <i>13</i> , <i>14</i> , <i>15</i>	8:6, 8, 11, 16,
month 129:3,	146:12, 13	New 1:1 6:1	odor 20:22	118:8, 11, 15	24 9:1, 2, 19,
4 165:4, 5	150: <i>16</i> 151: <i>6</i> ,	33:7 38:12, 17,	offer 40:2	119:3, 11, 18,	23 10:1, 3, 20
monthly 17:20,	9 155:1, 2	19 77:18 80:3	82:10	20 120:5, 10,	11:6, <i>10</i> , 23
22 18: <i>1</i> , 9	157:7 174:2 <i>1</i>	84: <i>4</i>	office 17:16	15, 19, 20, 22	12:2, 9, 16, 20
19:5 164:5	175:6	night 71:3	37:5 42:19	121:4, 10	13: <i>1</i> , <i>15</i> , <i>21</i>
months 69:20	named 27:17	146:18, 20, 23,	45:10 51:8	125:2, 12, 22,	15:3 16:7
81:19 119:14	152: <i>14</i>	24	52:7 57:5, 7	24 126:1, 5, 9,	17:3, 11 18:5,
131:18, 19	names 28:23	nine 71:1	63:5 65:5, 7,	13, 15, 16, 17	12 19:13
140:17 141:11	95:6 156:2 <i>1</i>	Nitti 110:16	17, 18, 24 66:7	129:11 137:22	20:14, 19
144:18	163:1	nonpaid	76:4 80:1	138:5 140:14	21:20 23:16,
morning 4:18	narrow 18:23	115:22 116:3,	85:1 87:5	141:6, 17	22 24:10, 15,
5: <i>15</i> 71: <i>1</i> , <i>16</i> ,	36:4 39:17	5	91:5 96:15	142:3, 12	23 25:10, 19
17	nature 69:2	nonprofit 12:8	99:3, 14, 17, 19,	149:2, 3	26:8 27:1, 16,
motion 21:18			21 100:22	150:17 155:22	21, 24 28:3, 8
				100.17 100.122	

29:2, 5, 18	135:9 137:3, 5
30:21 32:7	7, 24 138:7, 17
35:23 36:1	141: <i>10</i> 142: <i>14</i>
41:3 42:11, 14	17, 20, 24
45:4 49:14, 17	143:11, 14
50:10 51:19	145:15 146:12
53:3, 12 58:16,	147:9, 16
21 59:21 60:6,	148:2, 16
20 61:1, 6, 9,	149:5, 11, 13
13 62:11	150:10, 15
64:18 66:20	150.10, 15
	· ·
67:1 69:13, 19	152:2 153:6,
70:15, 23 71:7,	19 154:24
19, 24 72:3	155: <i>1</i> 156: <i>7</i>
73:15 75:13,	158:5, 23
19 76:5, 8	159: <i>19</i> 160: <i>1</i> 166: <i>11</i> , <i>14</i> , <i>17</i>
78:1, 8, 15, 21	166:11, 14, 17
79:5 80:9, 13 81:8 82:17	167: <i>1</i> 168: <i>15</i>
81:8 82:17	169:7 170: <i>18</i>
83:4 84:5, 24	171: <i>7</i> , <i>12</i>
86:6, 9, 10, 20	175: <i>18</i>
87:2, 6, 8, 12,	old 147: <i>1</i>
18 88:1, 5, 6,	once 43:24
13, 14, 18, 22	78:10 84:1, 7
89:7, 10, 16, 23	111: <i>12</i> 140: <i>6</i>
90:4, 14, 15	143:16 144:12
91:6, 10, 15, 19,	<i>15</i> 165: <i>4</i>
20 92:11, 16,	174: <i>10</i>
23 93:1, 11	ones 39:10
94:21 95:1, 15, 19, 23 96:1, 4,	168:20 169: <i>1</i>
<i>19</i> , <i>23</i> 96: <i>1</i> , <i>4</i> ,	ongoing 92:5 93:8, 11, 19
21 97:5, 11, 14,	93:8, 11, 19
16 98:15, 21	94:15, 18, 20
99:8, 20, 23	120:22, 24
100:18 101:8,	121: <i>14</i> , <i>16</i> , <i>17</i>
<i>24</i> 102:9, <i>14</i> ,	127:5
<i>18</i> 103: <i>19</i> , <i>21</i>	open 24:20
104:3, 13, 14,	26:11, 12
22 105:9, 12,	37: <i>15</i> 142:6, 9
19 106:2	161:20
107.14 18 21	opening 162: <i>1</i>
108:1 109:6,	openly 103: <i>14</i>
24 110:6, 10,	operated
12, 15, 19	160: <i>11</i>
111:2, 5, 13, 20	operating
112:4 113:4,	160:3
22 114:9, 24	operational
117:8, 12	11:2
120:2 121:3, 9,	operations
18, 22 122:4,	11: <i>11</i> 16:2 <i>1</i>
18, 24 123:1	52:24 53:11
124:19, 22	54:7
125:9 126:4,	OPERATOR
11 127:13	4:2 5:1, 9
128:4 129:5,	30:9, 19 64:10
14, 17 130:1, 4,	15 67:17
7, 15, 19, 23	68: <i>11</i> 104: <i>4</i> ,
131:9, 15, 23	10, 24 105:6
131.9, 13, 23 133:24 134:16	175:23 176:12
155.27 157.10	. 175.25 170.12

2/14/
opportunity 108:9, 15 123:8 134:1
opposed 33:13 39:22 46:20 47:16 54:19
opposition 37: <i>14</i>
option 68:7 137: <i>13</i> , <i>14</i> order 16:2 <i>3</i>
159:6 176:20 ordered 55:1 56:21
ordering 176: <i>13</i> , <i>15</i>
orders 44:9 45:6, 19 58:1 100:3, 4, 24
organization 11: <i>15</i> 156: <i>16</i>
organizations 153:8 organized
43:24 68:24 69: <i>1</i>
originally 10:11 11:18 93:14, 21
outcome 115: <i>12</i>
outlet 34:18 35:15 36:14
outline 15:9 62:10 167:5
outlined 171:5 outside 12:17
20:24 21:4 28:14, 15 40:9, 12 135:23
136: <i>3</i> , <i>10</i> overall 68: <i>5</i>
overhear 97:21 overheard
96: <i>14</i> oversaw 54: <i>3</i>
79:2 oversee 42:23 43:9, 20 52:15,
17 54:15 57:19 141:4
overseeing 46: <i>10</i> 81: <i>4</i>
128:8 oversight 46:8 52:9 56:10
59: <i>I</i> 80: <i>I</i> 123:5

overspent 14:15 overtake 52:17 overtime 69:5, 6, 9, 11, 18 70:16 owed 48:5 owned 28:20, 22 39:7, 9, 11 160:12, 13 161:12 owners 160:18 161:7 owns 28:23
owns 28:23 < P > p.m 68:12 104:5, 11 105:1 175:24 176:3 PAGE 3:3, 14, 18 86:3 111:5, 7, 11, 21 pages 85:24 paid 12:10 46:20 paint 34:22 35:6 PAL 10:6, 10, 20 11:3, 22 12:3, 4, 17, 21, 22 13:22, 23 14:8, 9, 18 15:6, 8, 13, 19, 24 16:4, 9 17:1, 4, 7, 12, 13, 24 19:15, 19, 20, 22 20:7, 13, 15, 16 23:24 24:12, 13 25:6, 7, 22 26:15 27:20 28:1, 4, 6, 17 29:1, 6, 9, 10 31:9, 16 33:7, 9, 10, 13 34:23 36:24 37:8, 10 38:9, 13, 19, 23 39:1, 3, 7, 11, 19, 20 40:1, 8, 9, 12, 16, 20, 22, 23, 24 41:1, 20
43:7 44:7 46:5, 17 47:3, 6, 8, 23 48:2 49:20 50:7, 17 52:5, 9, 15, 17, 18 53:4, 5, 6, 23 54:15 55:6

56:10 57:4
JU.10 J1.4
50.14 22 50.1
58:14, 23 59:1,
<i>15</i> 60:2, <i>3</i> , <i>6</i>
61:3, 11, 19
62:1, 6, 15
62.10 67.0
63:10 67:9
69.10 22
07.17, 22
69:19, 22 70:12, 23, 24 71:6, 20 72:13, 19 73:8 74:15, 23 75:2, 7, 15
71 6 20 72 12
/1:0, 20 /2:13,
10 72.9 74.15
19 /3.0 /4.13,
23 75.2 7 15
25 75.2,7,15
78:4, 6, 9, 11, 18, 23 79:2, 9
10 22 70.2 0
18, 23 19:2, 9
80:1, 3, 6, 20
00.1, 5, 0, 20
81:4, 7, 15, 22
82:4, 5, 19
83:13 96:12
97:20 101:18,
20 102:3, 11
102 14 20
103:14, 20
109:10, 13
110: <i>3</i> , <i>4</i>
110.0, 1
117:17, 19, 21,
22 127:12, 14
22 127:12, 14
130:17 132:1,
<i>17</i> 140: <i>14</i>
141:6, 8, 16, 17
142:3, 9, 12
147: <i>11</i> 150: <i>6</i> ,
1.7.11 150.0,
8, 13, 17
151: <i>14</i> , <i>17</i>
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3.
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3.
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3.
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3.
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3.
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3.
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related 46:19 68:23
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related 46:19 68:23 112:14 117:19,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related 46:19 68:23 112:14 117:19,
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related 46:19 68:23 112:14 117:19, 24
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related 46:19 68:23 112:14 117:19, 24
151:14, 17 152:14 153:3, 7, 8, 11, 15 154:10, 11, 16 155:5, 23 156:14 157:14, 16 158:7, 12 159:8, 16, 19, 22 160:2, 8, 11, 12, 13, 15, 16, 17 161:1, 4, 5 162:23, 24 163:4, 8, 22 166:19 167:3, 9, 13 168:8 169:17 170:15 172:17 173:1 176:15 PAL-2 89:19, 20 90:5 PAL-4 87:17 88:21 91:20, 21, 22 96:23 PAL-related 46:19 68:23 112:14 117:19,

paperwork
22:13, 23 69:3
73:3, 12 79:19
82:23
paragraph
86:15 90:7, 10,
<i>15</i> 112:2, <i>5</i> , <i>18</i>
125:19
pardon 155:23 156:3 163:14
156:3 163:14
parents 22:19 part 5:19
17:11 40:23
43:7 116:9
119:23 122:20
128:21 138:24
141:15 167:10
particular
88:18
parties 37:17,
18 39:15, 17,
21, 24
partner 128:8
parts 22:12 party 39:16
party 39:16 56:15
Pascucci 93:4,
5, 7, 19 117:9
120:7 121:9
128:19, 20
patch 38:15
patching 38:15
Paterson
10:12, 15 24:2
25:13, 15, 21,
23 27:3 36:8,
22 37:4, 6 47:17 48:2, 16,
47:17 48:2, 10, 19 51:6, 7, 10
52:7, 12, 15
53:12, 18, 20
55:24 56:5
69:23 78:19
79:1, 2, 4, 8, 21
132:4, 6, 12
patrol 52:24
53:1, 10 54:4,
6
pay 48:15
146:4 161:6
paying 46:16, 18 47:2, 5, 13
48:6, 7
pays 12:5
PDI 116:21
pending 78:16
142:19
Penn 39:20
152:18 153:24

prior 41:9

PENNSYLVAN	113:13 143:3,	pocketbook
IA 1:1 2:1	<i>16</i> 149: <i>1</i> , <i>7</i> , <i>16</i> ,	32:15
4:8	24 150:10	pocketbooks
people 6:7	154:6	31:22 32:11,
13:21 24:21	phones 85:2	12
41:19, 21	phrase 39:6	point 7:11
42:23 43:4	physically	8:21 22:3
47:5 49:5	63:7 144:3, 11	63:24 76:23
59:18 66:17	pick 32:4	101:5 112:18
80:3 84:10, 17	69:24	116: <i>1</i> , <i>10</i>
91:3 94:16	picked 68:23	133:22 172:9
102:10 113:6	70:2	pointing
115:7, 18	pictures 22:14	126:12, 14
121: <i>3</i> 123:2 <i>1</i>	piece 23:13	points 73:5
124:12 134:20	pieces 150:3	Police 2:1
143:22 173:2	pinpoint 19:3,	4:24 9:14, 15
perfectly 6:24	4 79:1, 3	20 11:1, 9
perform 155:8		
	pituitary	12:4, 7, 10, 11
peripheral	138:23 139:1	12, 16 13:12
21:12	Place 1:1 2:1	24:24 36:3, 1
permission	19:11 49:2	41:19, 21 43:
24:8 59:19	56:14 57:23	46:15, 21
61:4	62:19 63:2, 4	47:13 48:21,
person 21: <i>1</i>	65:21 81:6, 14	23 49:1 50:8
28:23 56:24	98:22 101:20	55:3 56:9, 11
66:9 75: <i>15</i>	105:17 106:3	57:4 59:2
116:2 134:9	113:19 118:10	60:9 63:11, 2
135:18 141:19	120:18 150:11	64:21 67:2
150:18, 19, 20	165:2 <i>3</i> 170:2 <i>1</i>	72:8 104: <i>17</i>
175:2, 9	placed 75:15	129: <i>11</i> 144: <i>6</i>
personal	150: <i>16</i>	9 149:2
84:20, 21	Plaintiff 1:1	150: <i>17</i> 152: <i>1</i>
112: <i>17</i>	2:1 4:5, 22	22 153: <i>1</i>
persons 90:24	90:16	159: <i>12</i> 163: <i>3</i>
pertaining	plan 31:20	<i>4</i> , <i>13</i> , <i>14</i> 166:
11: <i>13</i> 54:6	planned 14:7	9 172:19, 22,
61:24 72:23	47:10, 11	23, 24 173:11
108:4	planning	police-related
pertains	37:18 42:20,	87:1
168:22	22 43:5	policies 49:9
petty 118:8	plans 42:24	50:15
173: <i>13</i>	platform	policy 16:22
ph 16:18 70:6	112:17	46:16 49:6, 1
PHILADELPH	play 64:22	12, 13, 15, 21,
IA 1:1 2:1	players 43:18	23 50:1, 5, 8,
4:6, 19 5:16	playing 45:22	11, 23, 24 55:
9:12, 15 12:4,	please 4:16	10, 11, 16, 18,
9, 16 29:3	5:2 6:19	22 56:1, 2, 7,
36:23 60:7, 21	22:24 45:1	19 58:23 59:
132:3 134:5	100:8 108:17	62:9, 24 92:6
135:10, 23	137:6 139:15	94:22 120:23
136: <i>3</i> 137: <i>11</i> 139: <i>3</i> 152:22	152:12 167:21	130:12 133:7
	173:23	17 134:3
phone 66:10	plugs 34:10	151:14 159:8
83:13, 16, 20,	plus 23:9	166:7
23 84:9, 16, 20,	pocket 32:14	poorly 160:24
21, 22 85:3	118:22 119: <i>1</i> 2,	portion 30:15
86:16, 17, 21,	19 159:7	31:2 68:16
23, 24 87:1, 3	1	1

100:12 139:23 164:19 **position** 12:13 53:21 76:24 124:18 142:3 possible 64:2 76:2 potential 113:19 **power** 37:14 64:21 practice 20:9 Prazencia 17:9, 15 52:14 56:4 57:9 62:23 63:7 78:12 154:13 155:3, 4, 7 165:*3*, *15* 168:14, 19 169:3 174:15 Prazencia's 57:5. *7* prefer 82:9, 10 preferential 38:4, 8 39:12 presence 27:6 77:16 107:22 110:15, 22 161:23 PRESENT 2:1 4:16 18:10 63:7 106:22 123:13 presented 105:17 **President** 76:11 79:13 152:4, 6 pressure 78:5. 22 pretended 96:19 **pretty** 76:19 78:8 **prevent** 26:18 previous 22:14 82:21 90:6 169:16 previously 7:22, 23 79:12 87:16 89:18 91:17 92:13 111:20 130:6 **priest** 161:23 primarily 68:21 71:10 **print** 111:12

56:24 57:15 89:3 130:2 131:18, 19 139:11 140:5 142:8 161:21 166:*17* prioritizing 35:2 priority 25:9 **private** 86:17, 20, 24 probably 22:2 **problem** 28:14, 16 34:12 35:4, *15* 100:*18*, *23* 141:15 142:20 148:14 164:17 problems 22:20, 22 26:3. 18 27:11 35:9 37:16 38:10 125:4 159:5 172:18 proceed 5:10 7:10, 16 proceedings 177:4 **process** 48:14 81:17 118:3 126:24 127:1 144:15 processed 56:22 procurement 102:20, 21 163:8 **PRODUCTION** 3:18 program 13:24 14:5 18:24 31:19 32:9, 18 38:3 40:4, 5, 7, 8, 9, 12, 20, 24 41:1, 4, 6 102:5 118:4 119:6, 8, 9, 10, 13 programming 11:3 13:2 38:1 39:13 61:10, 14 62:1 programs 11:13 12:15 13:4, 6, 7, 9, 20, 21 14:1, 2, 6, 22 31:14 32:7, 24 33:14

39:24 40:16 59:14 60:15, 19, 20 69:1 70:19 154:4 156:13, 18, 20, 22 157:2 167:8, 11 173:2 promoted 52:6, 20 53:17, *18* 140:*17* 141:8, 19 prompted 66:16 166:15 **proper** 126:23 127:3 properly 14:6 46:12 74:3 83:24 84:3 101:*1* proposed 58:23 **protect** 23:19 24:19 25:2, 5, protected 101:12 protecting 44:20 protection 75:2 **provide** 12:17 75:22 provided 90:18 91:23 provisions 161:17 provoke 114:11 174:5 proximity 70:10 **PTSD-related** 139:5 **Public** 1:1 163:22 **puddles** 22:11 **pull** 66:6 85:11 86:2 87:15 91:19, 20 110:6 **purpose** 123:1 126:4 purses 32:16, 17 purview 132:*15* **put** 12:23 38:2, 12, 17, 19 43:4, 16 79:18 82:23 116:19

		•			
154:11, 19	questioned	reading 86:7	10, 12, 20	reiterated	repair 33:6
159:5 170:2 <i>1</i>	106:12 108:3,	95:16	47:23 48:2	52:16 123:22	161:18
putting 11: <i>14</i>	4 127:3	real 20:8	64:11, 16	reiterating	repairing 33:5
21:12 31:10	questioning	reality 75:7	67:15, 18, 21	159:8	repairs 37:19
35:2	127:5	realized 143:17	68:12 75:22	related 117:6	102:16 161:24
	questions 9:7	really 48:19	103:23 104:1,	relates 165:19	repeat 30:22
<q></q>	30:5 108:6	62:19 77:20	5, 11, 23 105:1,	relating 161:18	44:24 48:17
qualify 77:8	109: <i>1</i> 147:2 <i>1</i>	100:5	3, 7 115:17	relation 116:22	55:14 63:17
79:9, 14, 18, 22	148:7 155:20	re-ask 8:24	116:19 148:4	Relations	67:13 84:12
149:2 <i>1</i>	168:21 175:17,	reason 6:5	157:4 164:8,	137:11	100:8, 9
Quality 155:23	20	23:8 110:24	11 175:24	relationship	108:12 139:14,
Qualli 10:24	quick 148:1	111:6 143:22	recorded 4:4	54:11, 14 67:3	19 141:13
11:4, 7, 8, 20	155:19	144: <i>14</i> 170: <i>17</i>	rectified	72:21, 23	167:20
17:5, 8 18:16	quicker 148:5	reasoning	118:17	117:13 151:20	repeated 139: <i>17</i>
21:3, 6, 11, 23	quickly 90:8	41:11	redirect 33:1	153:3	
22:16 25:17,	quiet 66:3	reassign 75:4 129:22	redirected	relative 72:20 releases 160:24	repeatedly 171:24
19, 20, 24 26:13, 14 27:6	quite 24:11	reassigned	34:22 35:6 reestablish	relinquish	repeating 30:6
32:23 37:15	< R >	46:9	9: <i>10</i>	169:22	repetitive 5:24
41: <i>10</i> , <i>17</i>	Rabena 17:10	reassignment	refer 159:15	remain 8:12	9:7
46:18 47:2, 19	52:13 56:4	129:20	reference	150: <i>17</i>	rephrase 6:21
55:9, 15, 20	57:8 58:9	rec 161:12	18:22 114: <i>17</i> ,	remark 126:21	replaced 84:6,
56:4 59:5	62:23 63:6	recall 10:2, 14	20	remarks	8 85:10
62:23 63:6	72:17 73:19	35:10 65:4	referenced	173:16	140:13, 15
66:7, 9, 12	74:10, 13	73:13 75:14,	28:20 163:2	remember	142:11
112:9, 22	76:12, 15	17 97:15	referencing	6:23 7:24	replacing
113:1, 15, 16,	77:16 78:12	107:9 130:22	94:2	28:23 35:22	173:5
<i>17</i> 114: <i>4</i> , <i>15</i> ,	80: <i>4</i> 149: <i>18</i>	137: <i>14</i> 146: <i>13</i>	referred	52:22 53:15	report 10:9
20 118:12, 20	150: <i>4</i> , <i>5</i> , <i>15</i>	151: <i>1</i> , 8	159:12 169:19	78:6 105:22	51:4 105:14
123:4, 11, 17,	151: <i>13</i> , <i>19</i> , 22	156:2 <i>1</i> 160: <i>14</i> ,	referring 7:19	109:8 129:3, 4	132: <i>14</i> 134:2,
18, 20, 24	152:2 154: <i>13</i>	23 163:20, 24	109: <i>1</i> 113:2 <i>1</i>	136:2 <i>3</i> 137: <i>1</i> ,	5 146:19
124:6 154:6,	155: <i>1</i> 165: <i>4</i>	164:24 167: <i>1</i>	114: <i>10</i> 159: <i>16</i>	2 139:20	reported
10, 13 155:23	168: <i>13</i> , <i>18</i>	168: <i>11</i> , <i>19</i>	refrain 93:8	151:5 156: <i>15</i>	10:11, 15, 17
158:9 159: <i>4</i>	169: <i>3</i> 174: <i>16</i>	172: <i>14</i> 175: <i>13</i>	94:19 121:1,	171: <i>17</i>	13:8 51:20, 22
161:9 162:2 <i>4</i>	Rabena's 57:6	receive 15:8,	16	remembering	66:9 78:18
165: <i>3</i> , <i>15</i>	race 141:2	<i>12</i> 16:2, 7	refresh 97:7	117:10	79:4 93:22
168: <i>6</i> , <i>14</i>	Ragucci 96:11	105:19, 23	refused	reminder 7:13	109:2, 2 <i>1</i>
169:6, 10, 20	97: <i>19</i> 101: <i>16</i>	received 8:7	123:10, 15	remodeling	reporter 4:13
170:7	102:19, 21	18:18 62:5	124:20 125:7	39:1 102:17	5:2 6:3 30:8,
Qualli's 56:17	163:6, 7	93:24 105:14,	regarding	remote 4:3	17 31:4 64:8
Quarterly	ran 40:8, 22	21 131:2	147:11 153:7,	remove 138:16	68:18 100:14
164:2	41:15 68:22	134: <i>18</i> 149: <i>1</i> 161:20 174: <i>10</i>	15	removed	139:21 140:1,
question 6:9, 10, 15, 17, 18,	151:24 random 168:20	receiving 46:12	regardless 11:21 78:14	97:20 112:15 Renee 1:1	4, 20 159:1 164:8, 17, 21
20 7:2, 3, 9	rank 133:15	recess 64:13	137:22	4:13 30:6, 21	174:24 176:7
8:22, 24 24:11	137:22 138:3	68:9 104:7	regular 127:22	139:18 158:24	177:13, 19
30:7, 23 33:23	ranks 79:20	recognize	reimburse	164:13 177:8	Reporting
45: <i>1</i> 61: <i>3</i> , 2 <i>1</i>	reach 84:10, 17	87:20	118:14, 22	renovate 33:6	4:12, 15 10:12
68:14 73:10	read 6:12, 13	recognized	119:2, 17	renovating	22:15 60:17
78:16 82:11	8:9 30:16	90: <i>17</i>	reimbursed	38:23	109:7 132:5
100:8 108:12,	31:3 55:11, 17,	recollection	48: <i>1</i> , <i>4</i> 117:23	rent 161:6, 8,	134: <i>14</i>
22 111:23	23 56:8 68:17	151:3 156:9	119:22	22	reports 69:16
126:23 137:6	86:4, 18 88:2	recommended	reimbursement	rents 161:5	represent 5:16
139:15, 17, 19	90:10, 11, 13	155:9 162: <i>11</i>	48: <i>1</i> 119: <i>15</i>	reopen 26:4, 6,	110:19 137:18
142:19 146:6	95: <i>13</i> 100: <i>13</i>	recommending	126:20 157:23,	13, 19 28:9	representation
148: <i>1</i> 153: <i>13</i>	111: <i>14</i> 112:2,	74:12	24	reopened	126:24 127:4
164: <i>14</i> , <i>15</i> , <i>16</i>	5 122:19	record 4:17	reimbursing	28:10, 11	137:9
167:2 <i>1</i> 168:4	139:24 164: <i>14</i> ,	11:7 21: <i>16</i>	118: <i>18</i>	reopening 27:2	
170: <i>12</i>	15, 20 176:11	29:20, 23 30:8,	I	I	I

represented	50:12 162:4	Robert 52:13	running 32:9	95:17, 23, 24	Sergeant 21:3,
107:10, 11	170:15	56:4	169: <i>17</i>	110:23 122:21	4, 12 26:13, 16,
137:19, 23	rest 94:6	rolling 54:18	runs 68:23	scrolling 88:7	18 42:19, 21
Representing	168:20	Ron 17:10	Rush 152:14,	scuff 34:24	44:9, 11, 13, 16,
2:1 107:3, 5,	restaurant	57:8 58:9	16, 17, 21	se 40:8 100:19	18, 20, 21 45:5,
19 138:4	153:23	62:23 63:6	153:2, 6, 14	season 39:18	9, 13, 20 46:1,
represents	results 133:18	72:17 73:19	154:7	second 9:3	13, 14 47:1, 5
107:12, 15	retain 11:16	74:9, 10, 13	15 1.7	15:20 20:17	51:3, 14 52:1
reprimand	retaliated	76:11, 12	<s></s>	29:17 53:15	65:13, 16, 17
159:23	42:15	77:16 78:12	safer 33:15	55:14 67:16	66:5 69:14
reprimanded	retaliating	80:4 149:17	safety 24:5, 6	70:2 84:7	91:4, 16 92:4
92: <i>13</i>	109:15 110:3	150:4, 5, 15	36:11	85:12, 14	93:3, 5, 7, 19
reproduction	retaliation	151:22 154:13	salaries 12:10	86: <i>15</i> 99: <i>1</i>	94:14 95:9, 11
177: <i>17</i>	136:11	165: <i>4</i> 168: <i>13</i> ,	salary 12:5	103:23 104:2	96:2, 3, 5, 9, 10,
request 34:22	retire 116:6	18 169:3, 7	46:21 47:17	122:11 125:19	16 97:19, 22,
64:1, 4 71:24	retired 80:24	174:15	sat 16:5	132:6 152:12	24 98:3, 9, 15,
75:20, 22 76:4	132:4 144:6, 9	Ronald 57:6	37: <i>13</i> 41: <i>10</i>	secretively	24 99:4, 6, 9
116:5 119:10	152:24	roof 38:10, 12,	118:21 157:18	96: <i>10</i>	100:23 101:2,
requested	retreat 173:11	13, 17, 19	saw 73:23	section 38:15	6, 16, 21
30: <i>15</i> 31:2	returned	room 7:17	77:4 96:9, 18	secured 144:23	102:22 117:9
37: <i>10</i> 59: <i>23</i>	143: <i>16</i>	16:2 <i>1</i> , 22	103:9 106:8	Security 152:3	119:5, 6 120:6,
68: <i>16</i> 100: <i>12</i>	review 175:3	34:11	158:7 161:17	see 19:23	21 121:5, 9
139:23 164:19	reviewed 56:1	Ross 1:1 2:1	saying 6:4	44:11 45:8, 12	127:7, 10
requesting	90:16	17:9 49:7	47:1 48:18	52:16 65:22	128:9, 19, 20
118:2	Richard 141:3	50:16 51:9	50:3 59:12	68:2 73:1	129:10, 22
REQUESTS	rid 96:17	55:1, 24 56:3,	81:16 92:16,	75:23 85:18	131:16 132:16
3:18 166:3	101:18 103:6,	7 58:1 62:15,	20 93:16 94:8	88:1, 8, 19	163:5, 9, 10
required 73:8	8 169:18	20 63:5 76:19,	96:15 103:2	90:1, 8 93:3	sergeants 26:5,
rereading	right 5:1 8:9	24 77:5 79:13,	105:20 108:20	96:2, 19 99:4,	14 49:18 51:8
68: <i>14</i>	9:3 21:23	21 140:16	120:8 126:7	7 100:22	127:15, 24
resend 76:4	38:6, 14 56:2	141:4 150:1	132:24 137:24	102:24 109:23	sergeant's 46:8
resigning	59:3 60:22	168:9 175:4,	146:2 171:18	110:10, 12	serious 36:12
146:2	61:14 68:3	10	says 90:16	111:4, 6, 9, 22	124:15
resolve 66:2	73:13, 15, 18	rotate 127:15	97:6 110: <i>1</i> 2,	121:20 129:11	seriously
resolved 37:16	76:8 80:10, 15,	128:1	15 122:5, 6, 15	135:7, 20	126:20
respect 133:16	20 82:6 85:17	rotating 69:7,	125:20	158:6 160:2 <i>1</i>	served 166:19
151: <i>14</i> 153: <i>7</i>	88:12, 22	10, 17 70:17	scenarios 34:8	161:2 170:8, 9	Services 4:13,
respiratory	91:11 94:23	127:22	168:24	seek 51:23	15 71:23
22:20, 22	96:23 102:12,	roundhouse	schedule	seen 89:4	136:9
respond 42:1,	23 103:16	99:14	71:10, 11	99: <i>13</i> 111: <i>3</i>	serving 156:5
3	104:15 107:20	rude 58:12	130:11 159:20	130:22 158:3	set 159:20
responded	111:7, 8	rug 23:14	scheduled	160:20 170: <i>14</i>	162: <i>18</i> 166:9
86:15	112:19 114:2	rule 117: <i>19</i>	114:2	selected	167:2, <i>11</i>
responding	117:6 118: <i>13</i>	118: <i>10</i> 158: <i>7</i>	schedules	140: <i>16</i> 141: <i>3</i>	setting 162:5
142: <i>18</i>	120:2 <i>1</i> 130: <i>17</i>	rules 98:12	166:9	163:5, 9	seven 39:16, 23
response 6:15	131: <i>12</i> 141:22	115:24 117: <i>16</i>	Scholarship	send 34:17	Shala 2:1
34:18 83:7	144: <i>11</i> 148: <i>16</i>	157:2 <i>4</i> 158: <i>3</i>	151:22, 23	124: <i>16</i>	4:11
responses 6:24	149: <i>3</i> 152: <i>11</i> ,	rumor 123:23	school 23:8	sending 75:7	shared 91:2
responsibilities	12 155:12	124:2	Schumann 1:1	113: <i>18</i> 123: <i>1</i>	sharing 87: <i>13</i>
10:2 <i>1</i> 11: <i>17</i>	170:24 176:18	rumors 125:2	4:14 68:13	senior 146: <i>19</i>	115: <i>11</i>
14:9 15:9	rightful 46:21	126: <i>16</i> 131: <i>11</i>	100:9 177:8	sense 170:13	SHARON 2:1
17:12 43:1	47: <i>16</i>	run 11:1, 15	scolded 27:6	sent 66:19	4:18 5:16
161: <i>18</i> 169:2 <i>1</i>	Rizzo 38:9, 13,	12:15 14:1, 2	scope 50:15	76:2 88:15	88: <i>16</i>
171:9	19, 23 39:1, 11,	20:23 67:8	screen 85:18	93:7 104: <i>17</i>	Sharon.ulak@p
responsibility	19 40:1 41:15	115:18 147:12	87: <i>13</i> 90: <i>1</i>	114: <i>19</i> 122:6	hila.gov 2:1
12:2 <i>1</i> 13:2	96: <i>12</i> 101:20	154: <i>10</i> , <i>18</i>	110: <i>10</i>	126:7 129: <i>15</i>	shift 70: <i>14</i>
171: <i>3</i>	102: <i>3</i> , <i>11</i>	167:9, 12	scroll 87:8	130:2 <i>0</i> 131: <i>1</i> ,	127: <i>13</i> , 22, 24
responsible	103:20 160:12,	169: <i>15</i>	88:5 90:8	9 147:14	128:23 129:2,
38:22 49:22	16	rundown 37:7	l	sentence 126:5	20, 22 130:13

		2/14/	2023		
a hif ta 127.16	l 122.2 7 0	1 122.21 22	l 101.2 22	l stop 7.11	l aubasausut
shifts 127: <i>16</i> , 24 166:5	123: <i>3</i> , <i>7</i> , <i>9</i> 124: <i>11</i> 161: <i>4</i>	132:21, 22 145:6 169:11	101:3, 23 112:12 132:14	stop 7:11 21:14 51:11	subsequent 99:2 100:20
shock 103:9	173:10	173:20	159:12, 16	65:8 66:4	substance
	situations	speaking	166:8 173:6,	87: <i>13</i> 100: <i>1</i>	142:2 <i>4</i>
shortly 21:2 72:10 97:22	112:9	82:10 97:19	15	115:11 120:7	sudden 109:21
show 22:8	six 39:16	109:15 121:16	staffing 12:18	stopped 22:20	suggested
36:16 47:8	81: <i>19</i> 119: <i>14</i>	125:22 168:20	14:3	23:10 30:1	115:2 <i>1</i>
116: <i>13</i> 121: <i>18</i>	slow 173:24	speaks 6:6	stamp 96:22	48:8 54:23	Suite 2:1
128:10, 11	slowly 42:24	171:9	stamp 90.22	170:22	Sullivan 4:20
129:5 154: <i>18</i>	110:23 111:16	special 15:12	111:2 <i>1</i>	story 144:1	5:17 9:13
160:22	173:5	38:12, 18	standard	straighten	10:13, 18 37:1,
showed 88:15,	small 138:22	Specialist 2:1	130:8, 12	49:7 50:18	3, 12 41:18, 24
24 89:5 122:2	smell 20:23	4:12 140:8, 11	start 30:24	51:9	42:1, 17 44:19
showing 74:3	22:2	specific 59:12	46:10 48:23	Street 2:1	45:8, 14, 15
122:4	snarky 173:16	108:6, 24	51:12 76:17	stress 139:4	47:18 49:2
shush 21:13	Solicitor 56:24	145:2 156:15	78:8 95:19	145:10	51:7, 14, 18, 23
shut 24:8	174:22	172:5	97:24 98:15	stressful	52:2, 5, 8, 14,
25:22, 24 26:1	Solicitor's	specifically	140:10 149:23	143:20 144:2	15, 20 53:17,
shutdown	174:20 175:3	168:10	started 5:19	strike 139:7	23 54:2, 9, 12
24:13	solidified 43:8	speculation	10:12, 20	strong 20:22	57:5, 8, 16, 18,
shutting 29:6	solution 27:10	89:10	17: <i>16</i> 19: <i>16</i>	structural	21 58:3 71:21,
sic 21:2	somebody	spend 31:21	38:23 42:20	28:14	24 77:10, 11
153: <i>14</i>	65:11 69:21,	117: <i>18</i> 118: <i>6</i> ,	44:8, 14 45:17	structure 60:4	78:3, 10 79:5,
sick 20:21	22 72:12	11, 22 119:1,	54:22 78:24	structured	24 80:14 81:3,
22:18 24:21	75:22 88: <i>14</i>	13	79:1, 4 93:22	59:4	22 82:3, 18, 20
144:3	164:7	spending	97:22 98:19	struggle 37:14	84:1, 2 85:24
side 41:19, 20,	someone's	14:16 31:10	123:21 139:8,	stuff 17:24	86:1, 3, 12
22 96:14	130:13	32:8 33:4, 11	9 144:12	39:4 59:20	90:19 91:2, 4,
113:15 144:1	soon 81:6	117:23	154:3 165:21	68:23 70:21	14, 24 92:3, 24
147:20 166:4 sided 113:15	109:20	spent 14:5 33:6	168:8 170: <i>10</i> starting 76: <i>18</i>	71: <i>17</i> 92: <i>9</i> 108: <i>3</i> 109: <i>9</i> ,	93:2, 5, 6 95:9 96:7 97:23
siding 42:6	Sorry 8: <i>16</i> 9:2 15: <i>3</i> 21:8,	spoke 24:1	124:2 125:1	11 116:20	98:1, 4, 12, 16
132: <i>17</i> 133:20	9 27:23 28:6	25:17, 19, 20,	149:24	117:18 118:17	99:4, 10, 11
sight 138:10	33:22 35:16	24 34:13 37:6	State 1:1	127:19 132:7,	100:2 101:12
sign 56:2	44:23, 24	47:17, 21	18:17 37:22	10 145:10	109:3, 7, 22
58:24 111: <i>10</i> ,	46:24 47:15	50:13 66:12	40:6 41:12, 14	162:7, 9, 11	110:5 112:19,
11, 14 131:20°	58:19 63:17	69:23 74:19	170: <i>14</i>	173:14, 18, 19,	23 113:7, 14,
158: <i>14</i> , <i>16</i>	64:3, 19 73:9	76:9 77:10, 12	stated 105:15	23 174:1, 4, 16	<i>16</i> , <i>24</i> 114: <i>14</i> ,
176: <i>11</i>	84:13 85:15	79:21 98:2	154: <i>11</i> , <i>18</i>	subject 50:8,	<i>17</i> 115:9
signal 68:5	88:4 89:9	123:3, 4	159:9 162: <i>1</i>	11 90:17	125:8 127:23
signaling 21:6,	103:24 108: <i>11</i> ,	131: <i>18</i> 145: <i>3</i>	Statement	122:15 129:19	128:24 131:24
11	<i>17</i> 113: <i>11</i>	146:10, 17, 23,	3: <i>16</i> 110: <i>13</i>	subjecting	132:5, 7, 8, 10,
signature	128:7, 13	24 152:8, 10	112:24 113:21	112:11	23 133:12, 14
111:4, 6	136:21 139:18	153:10 154:7	114:14 137:22	submit 73:3	134:9, 20, 24
signed 111:7	140:20 141:14	171:21 172:21	statements	85:23 118:2	135:4 139:10
131: <i>18</i>	150:22 152:5	174:15	113:7 165:18	119:5, 14	143:19 147:11
significant	160:24 167:20	spoken 37:7 114: <i>14</i>	STATES 1:1	167:14	152:1, 9
67:24 similar 122: <i>10</i>	174:24 sort 8:21		4:7 86:15 170:6 171:2	submitted 41:8 64:23	170:22 171:2 <i>1</i> 172:2 174: <i>14</i>
Simultaneous	21: <i>17</i>	spreading 126: <i>16</i>	stating 125:21	73:12 114:16	Sullivan's
113:9 136:7	sound 5:23	squad 15:22	143:4 149: <i>17</i>	subordinate	45:10 99:14,
sinkhole 23:13	106:20	Square 2:1	status 115:22	42: <i>19</i> 44: <i>9</i>	21 133:13
sit 124:3	sparking 34:10	St 70:9	116:3, 6	59:18 60:1	Sunny 14:20,
157:13 162:6	speak 14:22	staff 11:24	stay 57:15, 17	61:4 101:3	23 15:4, 5
situation	37:9 44:10	23:19 35:6	127:20	132:14	16:5 21:4
45:13 66:7	81:9 92:4	50:9, 10 57:4	stayed 14:15	subpoena	22:16 34:17,
108:7 112:2 <i>1</i>	117:9, <i>17</i>	59:16, 18 60:1,	53:20	93:16 94:1	18 47:19 55:9,
113:2 114:7	121:10 123:8,	2, 3, 7 61:4	stenographic	105: <i>14</i> , <i>21</i>	<i>15</i> 118:7, 22
117:22 118: <i>17</i>	10 125:11, 12	63:11 66:8, 14	l 177:6	I	I

119: <i>15</i> , <i>16</i>	37:10 42:18	teams 46:3	16, 17, 18, 23,	140:3 147:22	142:8
158:9	44:19 45:16	156:14, 15, 22	24 95:22 98:4	148:16 155:14	throw 20:24
superior 100:2	52:5, 11 55:18	technical 8:20,	99:1, 2, 9, 11,	175:16, 18	throwing
supervise	56:19 58:6	21 29:15	18, 20 101:7	Thanksgiving	20:24 144:3
128:2 <i>1</i>	62:19 63:2, 4	63:15 67:10	111:11 120:21	43: <i>13</i>	Thursday
supervision	89:16 90:9	104:21	121:13, 15	thick 22:13	144:20
177:19	97: <i>16</i> 101: <i>13</i> ,	Ted 10:24	125:11 145:13	thing 20:20	tickets 46:2, 6
	20 115:22		147:4, 5	24:5 26:22	time 4:10 6:6
supervisor	122:5 124:20	11:3, 7, 8, 20,		48:3 50:12	
123:15 133:7,	150:3 169:21	24 13:8 14:1,	154: <i>17</i> 171: <i>16</i> , 24 172:9	66:11 67:14	7:6, 15 9:5, 7,
9, 18 144:19 157:18		21 17:5, 8, 16			13 17:15 19:2
	176:20	18:16, 21 21:3,	174:6	74:13, 14	20:7 22:7
support 12:18	taken 1:1	6, 11, 23 22:16	telling 21:14	76:15 85:9	25:18 30:9, 19
14:3 31:14	36:12 40:6	25:17, 19, 24	23:4 26:5	96:22 111:3	42:17 45:23
132:18	57:18 64:13	26:13, 14, 19,	54:22 66:15	117:15	54:16 56:12,
supposed 11:4,	68:9 98:22	21 27:4, 6	94:11 99:24	things 11:19	23 57:3 64:10,
12 13:19 46:4	104:8 177:6	32:23 33:18,	101:3 134:11,	18:17 19:4, 24	15 67:17
54:24 55:5	takeover 173:1	24 34:3, 21	20 135:1, 19	31:6, 11, 13, 14,	68:11 73:23
56:15, 18 61:2,	Taliah 16:18	36:5, 15 37:15	142:15 168:11	15 37:17 39:1	74:6, 7 77:16
12 62:9, 10, 16	talk 19:14	41:10, 17	temporary	42:20 46:14	78:21, 24
75:3 77:13	21:5 34:7	46:18 47:2, 19	33:10	49:7 50:18	80:21 84:7
92:6 117:20	39:13 54:16	49:24 50:13	tend 6:7	58:17 61:9, 13,	85:7 86:16
118:11 127:15,	93:20 101:5	55:9, 15, 20	tenure 78:9	16, 20, 22	88:15 98:24
16 128:1, 5	102:7 104:15	56:4, 17 59:5,	terms 11:2	62:15 69:2	99:1, 13, 22
133:8 161:19	121: <i>11</i> 123: <i>16</i>	22, 24 61:2, 5	12:2 13: <i>1</i>	72:22 94:11	100:6, 18, 21
167:6 169: <i>14</i>	132:6 133:3, 4,	62:13, 23 63:6	14:16 19:23	98: <i>13</i> 103: <i>3</i>	104:4, 10, 24
170:2 <i>1</i>	10 138:8	66:7, 9, 12	20:10 23:22	120: <i>14</i> 154: <i>23</i>	105:6 107: <i>10</i> ,
sure 8:17	147:2 154:10,	112:8, 22	26:23 31:16	155:2 <i>1</i> 166: <i>4</i> ,	<i>11</i> 116: <i>17</i>
14: <i>14</i> 16: <i>11</i>	14 173:24	113: <i>1</i> , <i>15</i> , <i>16</i> ,	38:5 112:24	5	119:18 127:12,
25:11 32:15	talked 29:8	<i>17</i> 114: <i>4</i> , <i>15</i> ,	118: <i>4</i> , <i>5</i>	think 9:6	20 128:18
46:11 49:5, 10	143: <i>18</i> 155:2 <i>1</i>	20 117: <i>17</i>	138: <i>11</i> 145:9	21:2 22:4	130:10 131:6,
50:13, 23 64:6	157:22 162:20	118:12, 20	161: <i>13</i> 162: <i>13</i>	24:11 27:9	9 132:24
69:6, 9, <i>16</i>	163: <i>17</i> 167: <i>17</i> ,	123:4, 11, 13,	166:5	28:5 30:5, 21	133: <i>14</i> 144:22
72:5 88:11	24 168: <i>1</i>	16, 18, 20, 24	testified 5:6	31:24 32:2, 5	150:6, <i>10</i>
108:5 124:7	talking 21: <i>14</i>	124:6, 10	7:22, 23 27:16	35:12 39:10	151: <i>1</i> 153: <i>16</i>
136: <i>15</i> 139:2 <i>1</i>	65:19 93:8	125:6, 2 <i>1</i>	40:19 50:16	50:2 53:9	155:6 169:2 <i>1</i>
151:4 159:2	94:6, 19 96:6,	126:6 154:6,	51:2 58:2 <i>1</i>	58:19 64:7	175:23 176: <i>16</i> ,
164: <i>17</i> 167:22	7, 10, 14, 19	10, 13, 18	60:20 63:10	77:4 84:13	17
176:7	101: <i>17</i> , <i>19</i>	155:23 158:9	64:22 65:15	92:17 103:14	times 51:5
surely 42:24	103:10 113:18	159:4 160:22	72:11 82:2	110:20 120:19	71:11 72:22
173:5	120:9, <i>17</i>	161:9, 22	91:6, 7 97:18	122:12 131:6	98:24 99:2
surfaced 97:12	121: <i>1</i> 132:24	162:1, 7, 12, 24	101: <i>15</i> , <i>19</i>	139:8 140: <i>15</i>	100:20 118:13
surprise 43:19	141:18, 20	165:3, 15, 21,	102:2 104:18	141: <i>14</i> , <i>15</i>	135:3 149:9
surprised	154:3	23 167:18, 19	117:8 120:4	144:20 145:12	151: <i>16</i>
96:18	tantrums	168:2, <i>14</i>	131:2 <i>3</i> 145: <i>15</i>	149:22 155: <i>12</i>	title 36:18
suspicion 95:4	171:23	169:6, 9, 10, 13,	147:9 148:2 <i>4</i>	164: <i>13</i> 176: <i>19</i>	152: <i>18</i>
sustain 116:9	target 93:16	20, 22 170:6	149:9 154:2 <i>4</i>	third 43:10	today 5:18
swear 5:3	94: <i>1</i> 105: <i>15</i> ,	171: <i>3</i> , <i>16</i>	160:12	44: <i>3</i> 119: <i>18</i>	7:14, 17, 20
switch 71:2	20	172:5, 15, 21	testify 159:15	thought 32:18	8:12 131:24
83:21 127:18	task 46:9	174: <i>16</i> 175: <i>14</i>	testifying 7:24	36:3 93:13, 14,	155:2 <i>1</i> 163:2,
128: <i>14</i>	tasks 12: <i>14</i>	Ted's 36:18	testimony 8:2	21 105:16	17
Sworn 3:5 5:5	team 13:4, 5, 7,	55:12	24:24 25:11	106:2 108: <i>19</i>	Today's 4:9
symptoms	9, 22 15:22	tell 6:19, 22,	30: <i>16</i> 31: <i>3</i>	121: <i>13</i> 154: <i>4</i>	told 17:8, 9,
139:5	27:5, 14 34:22	23 7:7 8:24	58:18 68:17	thousands	17 22:17 23:1
	41:13, 14 43:8,	19: <i>17</i> 21:24	79:12 87:11	31:2 <i>1</i>	24:2 26:18
< T >	9 60:15, 17, 19,	37:11 41:22	99:9 100: <i>13</i>	threat 76:20	27:7 34: <i>14</i>
table 46:17, 19	20 69:1	42:23 45:11	139:24 164:20	three 22:15	37:13 38:13
47:3, 6, 14	156: <i>14</i> , <i>17</i> , <i>18</i> ,	83:18 86:7	thank 5:2	23:18 27:8	40:15 41:18
take 7:6, 7, 8	19, 20 157:2	88: <i>4</i> 90: <i>13</i>	45:4 49:19	30:4 102:10	43:9, 23 44:1,
20:23 31:12		91:22 94: <i>14</i> ,	87:11 97:11		19 45:9, 11, 15

47:20, 22 48:3 51:8, 10, 23 52:12 56:2, 12 57:15, 16, 22 58:9 61:12 66:3, 5 69:23, 24 70:13 72:24 73:2, 23 74:1 75:4 76:23 77:16 79:21 80:4 91:18 93:6 94:12, 14, 17 98:4, 6 99:11, *17* 101:*12* 103:5 106:19 110:4 113:24 115:9, 15, 22 116:12, 15 118:21 119:4 120:11, 20 121:9 123:19 127:23 128:24 133:14, 22 134:22, 23 135:3, 4, 5 137:16 143:19 144:1 145:3, 6, 8, 19, 23, 24 146:10, 11, 21, 22 147:2, 8 154:7 165:13, 15 167:18 168:5, 16 169:8, 11, 22 174:*14* top 23:14 110:12 122:5 129:17 151:8 totally 93:10 **touched** 162:8 tournaments 40:6 toys 43:14 track 14:15 training 15:12 16:2, 7 transcript 3:18 6:5, 12 8:3, 9 159:15 176:18 177:8, 17 transfer 58:10 72:1 73:1, 5, 20, 21, 22 74:2 76:17 77:1, 17 81:18 83:6 149:23 150:20 1:1 145:13

transferred
71:21, 22
72:19 74:1
76:1 79:15, 19
80:12, 20
81:10, 15 82:4,
5, 14, 19, 23
149: <i>19</i> transferring
83: <i>10</i>
travel 41:5, 8
70:11
traveling 40:14
treat 138:17,
20 139:6
treated 109:14
139:11
treating 132:19 treatment
38:5, 8 39: <i>13</i>
trick 9:9
tried 96:19
103: <i>10</i> 115: <i>4</i>
119: <i>14</i> 127:2 <i>1</i>
132:24 135:2
144: <i>13</i>
Trimmer 63:21 65:6
63:2 <i>1</i> 65:6 97:8 106:5
112:16 120:6
121:4 123:4, 5,
10 156:23
157:4, 15, 17
171: <i>13</i>
trip 9:9 trouble 113:3
true 94:12
truthful 7:4
try 27:10
36:4 62:8
128: <i>16</i> 133: <i>14</i>
155:19, 20
173:11 174:5
trying 8:17 9:8, 9 26:10,
9:8, 9 26:10, 12 27:4 36:1
47:23 55:10
60:13, 17
62:24 79:17
82:7 94:10
101:17 102:15
114:6, 11
115:8 120: <i>1</i> 2,
14, 19 122:13 131:4 132:11
135:14 154:23
131:4 132:11 135:14 154:23 172:20 173:17
TUESDAY
1.1 1/5.12

2/14/	2023
tumors 138: <i>15</i> ,	ultim 55:19
turn 69:3	unbel
83:23 89:17	34:21
125:18	undei
turned 41:9	42:8
109:4, 22	under
turning 22: <i>14</i> turns 126:22	125:3 under
twice 83:21	26:4
165:4	101:6
two 5:19 10:7,	undei
16 16:1 17:6	6:18,
19:22 22:5 73:4 78:17	27:18 59:11
79:3 85:2	under
97:15 98:5	9:16
109:3 112:22	25:11
113:6 127:17	54:24
128:2, 15, 17	56:13
138:21, 22	2 62 79:11
160:2 <i>1</i> 168:2 <i>0</i> two-liner 146: <i>1</i>	81:4
tving 125:4	123:1
tying 125:4 types 18:14	166:1
59:7	5, 20
T T	under
<u> Uh-huh 80:<i>16</i></u>	7:3 55:11
85: <i>19</i> 87:22	unfai
90:11 96:24	unifo
109:11 110:9	Unior
129:7	137:1
ULAK 2:1 3:7, 18 4:18	24 1: unit
5: <i>14</i> , <i>16</i> 29: <i>16</i> ,	52:12
19 30:1, 6, 21	77:18
31:23 45:2	113:2
46:23 63:16,	136:1
24 64:4, 7, 17	137:1
67:11, 15, 23 68:6, 13 69:8	149:2 167:3
75:21 76:8	173:1
77:24 82:9, 16	UNIT
84:13, 15	4:7
88:20 89:2, 15,	units
21, 24 95:19, 21 100:9, 16	Unive 152:3
103:22 104: <i>1</i> ,	Unive
12, 22 105:8	39:20
108:13, 17	153:2
109:5 113:10	unoff
136:12, 20	168:7
137: <i>4</i> 139: <i>18</i> 140: <i>9</i> , 2 <i>3</i> , 2 <i>4</i>	unpa
140.9, 23, 24 147:2 <i>1</i> 149:8,	upcor 65: <i>14</i>
13 175:19	updat
176:9, 19	updat

ultimately 55:19 59:16
unbeknownst
34:21
undermined 42:8
undermines
125:3 undermining
26:4 42:6
101:6 132: <i>13</i>
understand 6:18, 19 8:13
27:18 48:13
59:11 122:12
understanding 9:16 17:6
9:16 17:6 25:11 50:3 54:24 55:5
54:24 55:5 56:13, 22 57:1,
2 62:17, 18
79: <i>11</i> 80: <i>7</i> 81: <i>4</i> 99:8
81:4 99:8 123:14 143:14
166: <i>16</i> 170:2,
5, 20 171:20
understood 7:3 47:1
55:11 121:11
55: <i>11</i> 121: <i>11</i> unfair 73:2 <i>1</i> uniform 48: <i>12</i>
Union 110: <i>17</i>
137:15, 16, 19,
24 138:6 unit 20:9
52:12 71:18
77: <i>18</i> 112: <i>15</i> 113: <i>20</i> 132: <i>20</i>
136: <i>15</i> , <i>16</i>
137: <i>11</i> 141: <i>4</i>
149:20, 22 167:3 169:15
173:12
UNITED 1:1
4:7 units 151:15
Universal
152:3 University
39:20 152:18
153:24
unofficial 168:7
unpack 78:1
upcoming 65:14, 19
update 37:5
undates 36:0

upkeep 161:18 upper 79:20
upper 79:20
uproar 142:7
upset 46:13
48:3, 14, 19
62:19 92:14
119:20 174:2
119:20 174:2 upstairs 102:5
103:20
use 33:10
63:13, 18
64:22 65:9
86:20, 24 87:7
usually 87:5
< V >
validity 108:5 Valley 40:17 versus 4:5
Valley 40:17
vice 155:5
vice 155:5 vice-president
150.8
Video 2:1 4:3,
12 67:21
176:13, 20
Videotape 1:1
4:2 5:1, 9
30:9, 19 64:10,
15 67:17
68:11 104:4, 10, 24 105:6 175:23 176:12 viewing 172:24 violate 98:11
10, 24 105:6
175:23 176:12
viewing 172:24
violate 98:11
166:4
violation
46:15 49:8
50:1, 4 127:4
166:6
visit 19:20
70:20
visited 20:6
visiting 52:1
97:23, 24
99:10
voicemail
142:22 143: <i>1</i> ,
15
VP 150:6, 7
VS 1:1
< W >
Wait 88:9
150:2
waited 119: <i>14</i>
walk 23:14
102:24
×=-= -

walked 20:20
32.16 06.13
32: <i>16</i> 96: <i>13</i> 102: <i>23</i> 103: <i>1</i>
walkway 23:12
walkway 23.12 wall 22:10
35:7
want 7:1, 16 25:10 26:19
33:23 37:21
42:5 54:23
58:14 62:18
73:10 77:7, 17
78:1 86:2
90:9, 11, 12 91:7 95:1, 23 96:21 97:5 104:15 111:18 112:6 116:7
91:/ 95:1, 23
90:21 97:3 104:15 111:18
112.6 116.7
118:2, 14
123:22 124:13.
123:22 124: <i>13</i> , <i>19</i> , 22 125: <i>18</i>
126:2 <i>3</i> 128: <i>14</i>
130:10 132:8,
23 133:1, 2, 3,
4 138:8 147:2
148:7 149: <i>11</i> 153: <i>11</i> , 22
153:11, 22
154: <i>16</i> 163:2 167: <i>12</i> 169: <i>17</i> ,
167:12 169:17,
20 170:22
171:7
wanted 11:21
19:2 40: <i>13</i> 41:8 42: <i>5</i>
49:3, 9 50:18,
22 52:9 55:16
57:6 58:23
57:6 58:23 72:15 77:1
91.16 96.13
101: <i>11</i> 114: <i>1</i> 117:23 119:8
117:23 119:8
125:6 145:24
149: <i>19</i> 150: <i>16</i>
154:7 159:2
167:5
wanting 37:15
wants 52:11,
<i>17</i> 99:2 101: <i>3</i> ,
4 112:10
118: <i>16</i>
warden 22: <i>16</i> warned 119: <i>24</i>
warning
119:24
water 22:11
28:15
way 22:3
37:9 39:17
48:9 55:23

56:8 59:3	132:6, 21, 22	13:7, 11, 24	wrestling 40:4,	yelled 113:23
76:20 80:13	133:13 136:10	14:18 17:6	5, 7, 9, 20 41:1,	143:24 171:16
84:17 113:2	143:22 144:2 <i>1</i>	44:15 46:5	4, 13	yelling 65:5,
118:1 122:13	153:10 154:9	47:9, 12, 14	write 51:13	22 114:11, 16,
127:2 <i>1</i> 131:2 <i>1</i>	162:2, 14	48:12, 22	145:24 146: <i>1</i>	21 121:6
137:6 144:8	168:7	52:10 53:23	write-up 91: <i>17</i>	171: <i>18</i> 174: <i>14</i>
146: <i>3</i> 147: <i>11</i>	We're 5:17	54:8 67: <i>1</i>	writing 24:15	Yep 122:23
148:5 162: <i>14</i>	6:13 7:13 8:8	70:11, 23 71:3,	147:13	young 149:2,
172:17	18:24 19: <i>1</i>	4, 7, 9, 13, 16	written 91: <i>11</i>	19 151:5
weather 143:7	29:17 30:10	72:7 75:6, 7,	119:24	Younger 22:6,
Wednesday	46:4 51:19	15 83:20	wrong 79:23	7 46:10
122:7	62:1, 2, 3	84:23 85:6, 7	115:9	
week 17:16	85:22 91:20	98:9 112: <i>12</i>	wrongdoing	<z></z>
19:18 20:17	103:6 105: <i>1</i> , 7	121: <i>1</i> 125:5	116:9 117: <i>1</i> , 2	Zoom 6:2
45:13 52:2	111:6, <i>17</i>	127:7, 10	wrote 16:22	7:14 8:20
55:7 97:15	121: <i>18</i> 122: <i>13</i>	128:1, 19	51:5 89:7, <i>11</i>	144:20
weekend 47:9,	134: <i>16</i> 141: <i>14</i> ,	143:2 <i>1</i> 144:5	91:8 92:17, 21	
12	24 169:14	169: <i>14</i>	95:2, <i>5</i> 104: <i>18</i>	
weekends	we've 155:21	worked 12: <i>1</i>	ŕ	
47:10	158:2 <i>1</i>	13:12, 22, 23	< X >	
weekly 97:23	wife 70:8	17:5 62: <i>14</i>	XYZ 169:1, 15	
98:1, 16, 21	willing 115:23	67:5 68:2 <i>1</i>	,	
weeks 97:12	Wimberly	70: <i>1</i> , <i>12</i> 71: <i>14</i> ,	< Y >	
127: <i>17</i>	115: <i>15</i> 116: <i>11</i> ,	15 74:11	yeah 7:11	
welcome	24 142:22	80: <i>14</i> 121: <i>7</i>	11:5 35: <i>11</i>	
104: <i>13</i> 140: <i>4</i>	win 32:17	127: <i>14</i> 132:20	36:1 65:24	
well 6:13	wings 44:16	144: <i>18</i> 150:20,	70:18 75:17	
11: <i>12</i> 12: <i>14</i>	Wissinoming	22, 23 151:2	81:23 88:4, 11	
13: <i>10</i> , <i>17</i> 14: <i>4</i>	20:7, 12, 14	working 19:2 <i>1</i>	102:4 107: <i>17</i>	
26:1 34:19	26:15 27:17	20:10 22:22	110: <i>11</i> 111: <i>15</i>	
40:6 41:20	28:8 160:5	35:13, 14, 16	122: <i>10</i> 138: <i>14</i>	
42:16 43:14	161: <i>3</i> 162:2 <i>1</i>	54:11, 13	142:17 148:23	
45:10 47:18	witch 115:7	56:18, 23	157:6, 12	
59:11 71:5	135:6	60:18 71:20	159: <i>18</i> 160: <i>7</i>	
76:15, 23	WITNESS 3:3,	74:16, 18 75:3	176:19	
79:16 81:12	5 5:3 29:18	79:2 83:23	year 10:18	
84:14 93:18	31:6 45:5	84:3, 10, 17	44:6 47:11	
110:4 113:16	68:2, 20 76:9	85:4 86:17, 21,	49:2 54:10	
114:6 121:5 130: <i>16</i> 131: <i>4</i>	82: <i>13</i> 86: <i>6</i> 88: <i>23</i> 89: <i>14</i>	22 96: <i>17</i> 102:6, <i>15</i>	62:2 80:9, 14	
133:6, 16	90: <i>14</i> 108: <i>19</i> ,	102.0, 13 115:17 117:12	81:2, <i>13</i> , <i>17</i> , <i>18</i> , <i>21</i> 82: <i>1</i> , <i>6</i> , <i>14</i>	
136:17 143:16	23 121:3	132:1 142:5	115:23 118:20	
144:4, 19, 22	136:8, 18	167:7 173:4	119: <i>16</i> 156: <i>6</i> ,	
147:2 148:3	137:3 140:5,	workplace	7	
149:22 154:22	22 159:4	124:4 125:5,	years 10:7, 16	
158:8 161:19	175:2, 18	17	15: <i>15</i> 16: <i>1</i>	
169:22 174: <i>16</i>	witnessed	work-related	22:15 23:18	
went 20:1, 11	121:6, 8	143:8	27:8 29:14	
22:4 37:8	woman 141:24	works 16:6	31:8 38:16	
49:1 51:23	154: <i>15</i>	28:1, 3, 6	73:4 78:17	
55:23 56:16	wood 23:14	118: <i>1</i> 128: <i>12</i>	79:3 142:8	
57:5, 8 65:22	worded 160:24	163:4, 8	161:2 <i>1</i>	
71:10 77:13	word-for-word	World 40:7	yell 112: <i>13</i>	
80:8, 19, 21, 23	111: <i>18</i> 143: <i>5</i>	worry 57:9, 11	114:3 143:23	
81:7, 19 88:24	words 66:5	58:10 79:22	171:23 172:9,	
96:12 105:23	109:8 121: <i>15</i>	80:3	11, 13, 15	
113:14 114:18	143:12	worse 114:8	173:22 174:2	
115:20 119:5	work 10:24		175: <i>14</i>	
123:4 128:23	11: <i>1</i> , <i>1</i> 2, <i>1</i> 9	 	<u> </u>	<u> </u>